

ORIGINAL

**FILED**  
LOS ANGELES SUPERIOR COURT

OCT 02 2007

JOHN A. CLARKE, CLERK  
BY SHAUNYA WESLEY, DEPUTY

1 PHILIP J. GANZ, JR., APC (State Bar No. 57069)  
LAURIE SUSAN GORSLINE (State Bar No. 125650)  
2 GANZ & GORSLINE, A LAW PARTNERSHIP  
11620 Wilshire Boulevard, Suite 340  
3 Los Angeles, California 90025-1769  
Telephone: (310) 235-1700  
4 Facsimile: (310) 235-1707

5 Attorneys for Plaintiff  
MOLLY PAIGE  
6

7 SUPERIOR COURT OF CALIFORNIA  
8 COUNTY OF LOS ANGELES, CENTRAL  
9

10  
11 MOLLY PAIGE,

12 Plaintiff,

13  
14 v.

15 PACIFICA FOUNDATION, KPFK LOS  
16 ANGELES 90.7 FM dba PACIFICA RADIO  
- KPFK 90.7 FM, EVA GEORGIA, an  
17 individual, and DOES 1 through 50,  
18 inclusive,

19 Defendants.  
20  
21

CASE NO. BC 365 777  
Assigned to Judge Mark Mooney; Dept.  
68

NOTICE OF MOTION AND  
MOTION TO COMPEL FURTHER  
RESPONSES TO PLAINTIFF'S  
EMPLOYMENT FORM  
INTERROGATORIES AND  
REQUEST FOR MONETARY  
SANCTIONS IN THE SUM OF  
\$1,390.00 AGAINST DEFENDANTS  
PACIFICA FOUNDATION, EVA  
GEORGIA AND/OR THEIR  
COUNSEL PURSUANT TO C.C.P.  
§§ 2030.300, 2030.090, 2023.010;  
MEMORANDUM OF POINTS AND  
AUTHORITIES; AND  
DECLARATION OF LAURIE  
SUSAN GORSLINE IN SUPPORT  
THEREOF

22 [SEPARATE STATEMENT FILED  
23 CONCURRENTLY HEREWITH]

24 DATE: November 19, 2007  
25 TIME: 8:30 a.m.  
26 DEPT: 68

27 Complaint Filed: February 16, 2007  
28

CIT/CASE: BC365777 LEA/REF:

RECEIPT #: CDH032063060

DATE PAID: 10/02/07 03:24:09 PM

PAYMENT: \$40.00

RECEIVED:

CHECK: 40.00

CASH: 0.00

CHRG: 0.00

CRD: 0.00

0310

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2  
3 PLEASE TAKE NOTICE THAT on November 19, 2007 at 8:30 a.m. or as soon  
4 thereafter as the matter may be heard in Department 68 of the above-entitled court  
5 located at 111 North Hill Street, California 90012, Plaintiff Molly Paige's ("Plaintiff")  
6 **MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFF'S**  
7 **EMPLOYMENT FORM INTERROGATORIES AND REQUEST FOR**  
8 **MONETARY SANCTIONS IN THE SUM OF \$1,390.00 AGAINST**  
9 **DEFENDANTS PACIFICA FOUNDATION, EVA GEORGIA AND/OR THEIR**  
10 **COUNSEL PURSUANT TO C.C.P. §§ 2030.300, 2030.090, 2023.010 ("Motion")**  
11 will be heard. At that time, Plaintiff will move for an order requiring Defendants  
12 Pacifica Foundation and Eva Georgia to provide further responses to Plaintiff's  
13 Employment Form Interrogatories, Set One without objection within five (5) days.  
14 Plaintiff will also request that monetary sanctions in the sum of \$1,390.00 be imposed  
15 against Defendants Pacifica Foundation and Eva Georgia and/or their counsel payable  
16 within five (5) days.

17  
18 This Motion is made by Plaintiff on the grounds that Defendants failed to timely  
19 serve responses to the subject interrogatories and despite having waived all of their  
20 objections have nonetheless served untimely responses incorporating objections into  
21 each and every response. Furthermore, Defendants have failed to provide proper and  
22 complete responses to several of the interrogatories as more fully set forth in the  
23 accompanying Separate Statement. Specifically, although Defendants have been  
24 repeatedly advised that the responses were improper because they contained untimely  
25 objections and that some of the responses were incomplete and inadequate, Defendants  
26 have failed to provide any further responses. Thus, sanctions should be imposed for

1 Defendants' total failure to provide the requested responses without objection such that  
2 this motion could have been avoided.

3  
4 This Motion will be based on this Notice, the supporting Memorandum of Points  
5 and Authorities, the Declaration of Laurie Susan Gorsline (and exhibits thereto), the  
6 pleadings and papers on file in this action, as well as such other written and oral  
7 argument as may be submitted at the hearing of this Motion.

8  
9 Dated: October 1, 2007

PHILIP J. GANZ, JR., APC  
LAURIE SUSAN GORSLINE  
GANZ & GORSLINE, A LAW PARTNERSHIP

10  
11  
12 By \_\_\_\_\_

Laurie Susan Gorsline  
Attorneys for Plaintiff  
MOLLY PAIGE

1                                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2   **1. INTRODUCTION**

3           Plaintiff moves for an order requiring Defendants Pacifica Foundation and Eva  
4 Georgia to provide further responses to Plaintiff's Employment Form Interrogatories,  
5 Set One without objection within five (5) days. Plaintiff will also request that monetary  
6 sanctions in the sum of \$1,390.00 be imposed against Defendants Pacifica Foundation  
7 and Eva Georgia and/or their counsel payable within five (5) days.

8  
9           This Motion is made by Plaintiff on the grounds that Defendants failed to timely  
10 serve responses to the subject interrogatories and despite having waived all of their  
11 objections have nonetheless served untimely responses incorporating objections into  
12 each and every response. Furthermore, Defendants have failed to provide proper and  
13 complete responses to several of the interrogatories as more fully set forth in the  
14 accompanying Separate Statement. Specifically, although Defendants have been  
15 repeatedly advised that the responses were improper because they contained untimely  
16 objections and that some of the responses were incomplete and inadequate, Defendants  
17 have failed to provide any further responses. Thus, sanctions should be imposed for  
18 Defendants' total failure to provide the requested responses without objection such that  
19 this motion could have been avoided. Accordingly, this Motion should be granted.

20  
21   **2. STATEMENT OF FACTS**

22       **A. Summary of Claims**

23           This lawsuit was initiated by Plaintiff MOLLY PAIGE, against Defendants  
24 PACIFICA FOUNDATION, KPFK LOS ANGELES 90.7 FM dba PACIFICA RADIO -  
25 KPFK 90.7 FM, and EVA GEORGIA (all collectively "Defendants,"), to recover  
26 damages from Defendants for, inter alia, illegal sexual/racial harassment, retaliation,  
27

1 intentional infliction of emotional distress, negligence, violation of Civil Code Section  
2 52.1, violation of the Labor Code, etc.

3  
4 **B. Statement of Facts**

5 From in or around February 2005, Ms. Paige has been employed as the News  
6 Director at KPFK Los Angeles by Pacifica Foundation, (hereinafter "the Company" or  
7 "the Station"), reporting to Supervisor General Manager Eva Georgia. As a condition of  
8 her employment at the Company, Ms. Paige was forced to endure a sexually charged,  
9 racially hostile and intolerable working environment. During her tenure, her direct  
10 supervisor, General Manager Eva Georgia, repeatedly broke the law by sexually  
11 harassing Ms. Paige, subjecting her to unwanted touches, vulgar comments, numerous  
12 romantic overtures, and other offensive conduct. Indeed, when Ms. Paige resisted  
13 Georgia's unwanted advances, not only did Georgia still continue to harass Ms. Paige,  
14 but because Ms. Paige refused to submit to Georgia's sexual advances, Georgia initiated  
15 a campaign of malicious retaliation against her in an effort to get her to quit her job. In  
16 addition, besides having to suffer Georgia's demeaning treatment, Ms. Paige has also  
17 had to endure racially (and sometimes sexually) degrading harassment at the hands of  
18 Program Director Armando Gudino, and Fernando Velazquez, her Co-News Director,  
19 which should not have been permitted in any work environment. There have been  
20 numerous prior complaints about Georgia, Guidino and Velasquez, yet the Company has  
21 failed to take prompt or effective action. The Company has a pattern and practice of  
22 engaging in sexually and racially harassing and discriminatory conduct and of retaliating  
23 against those who complain.

24  
25 Because Plaintiff refused to acquiesce and then complained about the harassment,  
26 discrimination and retaliation, Defendants began a course of conduct, in which they  
27

1 vilified, humiliated and retaliated against Plaintiff by among other things, cutting  
2 Plaintiff's newscast, refusing Plaintiff the opportunity to report on significant  
3 newsworthy events, denying Plaintiff the opportunity to air her own significant  
4 interviews, cutting Plaintiff's support staff, subjecting Plaintiff to arbitrary and disparate  
5 standards, cutting Plaintiff out of special programming, undermining Plaintiff's  
6 authority, attempting to isolate Plaintiff and cause others to shun her, intimidating  
7 Plaintiff, attempting to silence Plaintiff's complaints and engaging in conduct meant to  
8 punish and ostracize her, cutting off funding for Plaintiff's reporters, invading her  
9 privacy and other conduct according to proof.

10  
11 During Plaintiff's employment with the Company, she discovered and/or had a  
12 reasonable belief that the Defendants were engaged in various violations of the law,  
13 including fraudulent and misleading practices with regard to the solicitations for  
14 donations from the public and the proper distribution of such donations from the public,  
15 wage and hour violations, and the misappropriation of station resources for Georgia's  
16 personal use, about which she complained to Defendants' management, and/or brought  
17 such violations to the attention of management, or according to proof. As a result of  
18 these complaints, Plaintiff has been further harassed and retaliated against.

19  
20 Because of the wrongful conduct alleged in the First Amended Complaint, Ms.  
21 Paige has suffered and continues to suffer serious emotional distress, including anxiety,  
22 feelings of humiliation, self-recrimination, loss of self-esteem, and other symptoms.  
23 The foregoing emotional distress has also manifested itself in a host of physical  
24 symptoms such as chronic neck and shoulder pain which have required chiropractic  
25 medical attention as well as antidepressant medications. While Ms. Paige is proud of  
26 her accomplishments, she feels that the harassment and retaliation she has suffered has  
27

1 impacted her career as a newsperson, which will cause her future economic losses,  
2 thereby exacerbating her emotional distress.

3  
4 **3. THE DISCOVERY DISPUTE**

5 **A. The Interrogatories**

6 On April 5, 2007, Plaintiff served her Employment Interrogatories, Set One, and  
7 on Defendants. (Gorsline Decl. ¶ 2, Exhibits 1-2).

8  
9 **B. The Efforts To Meet And Confer**

10 On May 3, 2007, Plaintiff confirmed an extension for Defendants to respond to  
11 the subject discovery, to and including May 24, 2007. A copy of the May 3, 2007 letter  
12 confirming the extension is attached hereto as Exhibit 3.

13  
14 Because no responses were received on the due date of May 24, 2007, Plaintiff  
15 sent a meet and confer letter on June 8, 2007, requesting responses without objection, a  
16 copy of which is attached as Exhibit 4.

17  
18 By letter dated June 8, 2007, a copy of which is attached as Exhibit 5, Defendants  
19 stated that some sort of a response would hopefully be provided within about ten days.  
20 It was not until August 13, 2007 and August 17, 2007, respectively that Defendants  
21 finally served responses to the subject interrogatories, copies of which are attached as  
22 Exhibits 6 and 7 – over 2-1/2 months late.

23  
24 Because Defendants' responses contained untimely objections and inadequate  
25 responses, Plaintiff sent Defendants a meet and confer letter dated September 6, 2007, a  
26 copy of which is attached as Exhibit 8.

1 On September 13, 2007, Defendants sent a letter to Plaintiff's counsel addressing  
2 some of the issues with the responses, but failed to provide any further responses, much  
3 less without objection. A copy of this September 13, 2007 letter is attached as Exhibit 9.

4  
5 On September 20, 2007, because Plaintiff's counsel was in a 3-week jury trial,  
6 Plaintiff contacted defense counsel to obtain an extension to file the subject motion to  
7 compel and to arrange an after hours conference call to attempt to resolve the discovery  
8 dispute. However, Plaintiff's counsel was told that defense counsel was out of the  
9 country through Friday September 28, 2007 and was not available. At that time,  
10 Plaintiff's counsel attempted to obtain an extension of time to move to compel regarding  
11 the subject discovery. Having heard nothing back from defense counsel, on September  
12 26, 2007, Plaintiff made the written request for the extension by letter of the same date,  
13 a copy of which is attached as Exhibit 10.

14  
15 After several days of following up with defense counsel's office, on September  
16 26, 2007, defense counsel's office called to inform Plaintiff's counsel that no extension  
17 would be granted. Plaintiff confirmed this denial of the extension by letter dated  
18 September 30, 2007, a copy of which is attached as Exhibit 11. Because defense  
19 counsel was not available to discuss the pending discovery, refused to provide any  
20 further responses without objection and refused to extend the motion deadline, Plaintiff  
21 had no choice but to file this Motion at this time since the last day to file said Motion is  
22 October 2, 2007. Accordingly, this Motion followed.



1 **4. DEFENDANTS HAVE REFUSED TO PROVIDE RESPONSES WITHOUT**  
2 **OBJECTION EVEN THOUGH THEIR RESPONSES WERE UNTIMELY**

3 Defendants' Responses to the Employment Form Interrogatories were due on May  
4 24, 2007, but were not served until August 13, 2007 and August 17, 2007, respectively.  
5 Defendants did not have any extension of time after May 24, 2007 to make objections or  
6 respond to the requests. Nonetheless, Defendants lodged numerous boilerplate  
7 objections with regard to each of the subject interrogatories. Since the responses were  
8 untimely served, **all objections were already waived**. See, C.C.P. §2030.290("If a  
9 party to whom interrogatories are directed fails to serve a timely response, the following  
10 rules apply: (a) The party to whom the interrogatories are directed waives any right to  
11 exercise the option to produce writings under Section 2030.230, as well as any objection  
12 to the interrogatories, including one based on privilege or on the protection for work  
13 product under Chapter 4 (commencing with Section 2018.010).") Defendants'  
14 responses to the extent they contain objections are completely improper and in violation  
15 of the Code. Since it is unclear whether Defendants are withholding information  
16 pursuant to their objections, further responses are required. Accordingly, Defendants  
17 should be ordered to provide further and complete responses without objection.

18 **5. DEFENDANTS HAVE FAILED TO PROVIDE ANY RESPONSE TO**  
19 **PLAINTIFF'S FORM INTERROGATORIES**

20 Pursuant to Code of Civil Procedure Section 2030.300, this Court has the power  
21 to order that Defendants provide further responses to the subject discovery. Here, as  
22 more fully set forth in the Separate Statement, Defendants have failed to provide proper  
23 responses to the subject form interrogatories. Although notified about the deficiencies  
24 in the responses, defense counsel has not been available to discuss the pending  
25 discovery, has refused to provide any further responses without objection, and has  
26 refused to extend the motion deadline. Accordingly, Plaintiff had no choice but to file  
27

1 this Motion at this time since the last day to file said Motion is October 2, 2007.

2 Accordingly, this Motion must be granted.

3  
4 **6. SANCTIONS SHOULD BE IMPOSED**

5 This Court has the power to grant sanctions against Defendants and/or her counsel  
6 for their wilful failure to comply with their discovery obligations. Code of Civil  
7 Procedure Sections 2030.300 and 2023.010 provide for the imposition of sanctions  
8 where a party has failed to comply with its discovery obligations. Here, as more clearly  
9 set forth in the Declaration of Laurie Susan Gorsline, sanctions in the sum of \$1,390.00  
10 ( hours – i.e., at least 2 hours of time for preparing the motion and the 1 hour attending  
11 the hearing – x Ms. Gorsline’s hourly rate of \$450.00, plus a filing fee of \$40.00) should  
12 be ordered to compensate Plaintiff for the attorney time and costs involved in preparing  
13 and attending the hearing of this Motion.

14  
15 **7. CONCLUSION**

16 For the reasons set forth herein, the Motion should be granted.

17  
18 Dated: September 30, 2007

PHILIP J. GANZ, JR., APC  
LAURIE SUSAN GORSLINE  
GANZ & GORSLINE, A LAW PARTNERSHIP

19  
20  
21  
22 By

Laurie Susan Gorsline  
Attorneys for Plaintiff  
MOLLY PAIGE

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

6

9

2

16

20

21

22

26

27

1           6.       Because Defendants' responses contained untimely objections and  
2 inadequate responses, Plaintiff sent Defendants a meet and confer letter dated  
3 September 6, 2007, a copy of which is attached as Exhibit 8.  
4

5           7.       On September 13, 2007, Defendants sent a letter to Plaintiff's counsel  
6 addressing some of the issues with the responses, but failed to provide any further  
7 responses, much less without objection. A copy of this September 13, 2007 letter is  
8 attached as Exhibit 9.  
9

10          8.       On September 20, 2007, because Plaintiff's counsel was in a 3-week jury  
11 trial, I had my secretary contact defense counsel to obtain an extension to file the subject  
12 motion to compel and to arrange an after hours conference call to attempt to resolve the  
13 discovery dispute. However, Plaintiff's counsel was told that defense counsel was out  
14 of the country through Friday, September 28, 2007 and was not available. At that time,  
15 Plaintiff's counsel attempted to obtain an extension of time to move to compel regarding  
16 the subject discovery. Having heard nothing back from defense counsel, on September  
17 26, 2007, Plaintiff's counsel made the written request for the extension by letter of the  
18 same date, a copy of which is attached as Exhibit 10.  
19

20          9.       After my secretary spent several days of following up with defense  
21 counsel's office, on September 26, 2007, defense counsel's office called to inform  
22 Plaintiff's counsel that no extension would be granted. Plaintiff confirmed this denial of  
23 the extension by letter dated September 30, 2007, a copy of which is attached as Exhibit  
24 11. Because defense counsel was not available to discuss the pending discovery,  
25 refused to provide any further responses without objection and refused to extend the  
26  
27  
28

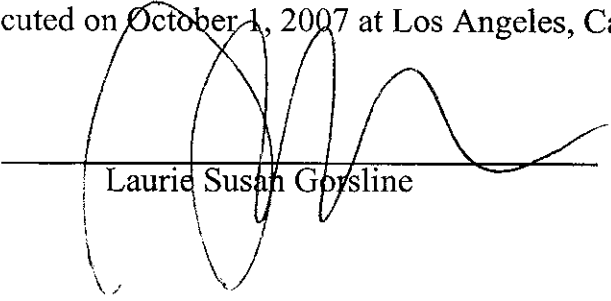
1 motion deadline, Plaintiff had no choice but to file this Motion at this time since the last  
2 day to file said Motion is October 2, 2007. Accordingly, this Motion followed.

3  
4 10. Plaintiff needs the requested discovery in order to conduct discovery and  
5 prepare this case for trial. Defendants' failure to provide proper and complete responses  
6 is prejudicing Plaintiff's ability to conduct discovery, as well her ability to prepare for  
7 the upcoming trial.

8  
9 11. Here, as more fully set forth in the Separate Statement, which is  
10 incorporated by reference herein, Defendants have failed to provide proper responses to  
11 the subject form interrogatories. Although notified about the deficiencies in the  
12 responses, defense counsel has not been available to discuss the pending discovery, has  
13 refused to provide any further responses without objection, and has refused to extend the  
14 motion deadline. Defendants' responses to the extent they contain objections are  
15 completely improper and in violation of the Code. Since it is unclear whether  
16 Defendants are withholding information pursuant to her objections, further responses are  
17 required. Accordingly, Defendants should be ordered to provide further and complete  
18 responses without objection.

19  
20 12. Sanctions in the sum of \$1,390.00 (for the over 2 hours it took to prepare  
21 this motion and supporting papers and at least 1 hour to attend this hearing multiplied by  
22 my hourly rate of \$450.00, plus a filing fee of \$40.00) should be ordered to compensate  
23 Plaintiff for the attorney time and costs involved in preparing and attending the hearing  
24 of this Motion.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct. Executed on October 1, 2007 at Los Angeles, California.

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

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

PHILIP J. GANZ, JR., APC (SBN 57069)

LAURIE SUSAN GORSLINE (SBN 125650)

GANZ &amp; GORSLINE, ALP

11620 Wilshire Blvd., Suite 340

Los Angeles, CA 90025

TELEPHONE NO.: (310) 235-1700

FAX NO. (Optional): (310) 235-1707

E-MAIL ADDRESS (Optional):

ATTORNEY FOR (Name): Plaintiff Molly Paige

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STANLEY MOSK COURTHOUSE

SHORT TITLE: PAIGE v. PACIFICA FOUNDATION, et al.

**FORM INTERROGATORIES – EMPLOYMENT LAW**

Asking Party: Plaintiff MOLLY PAGE

Answering Party: Defendant EVA GEORGIA

Set No.: ONE

CASE NUMBER:

BC365777

**Sec. 1. Instructions to All Parties**

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in employment cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

**Sec. 2. Instructions to the Asking Party**

- (a) These form interrogatories are designed for optional use by parties in employment cases. (Separate sets of interrogatories, *Form Interrogatories—General* (form DISC-001) and *Form Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004) may also be used where applicable in employment cases.)
- (b) Insert the names of the **EMPLOYEE** and **EMPLOYER** to whom these interrogatories apply in the definitions in sections 4(d) and (e) below.
- (c) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (d) The interrogatories in section 211.0, Loss of Income Interrogatories to Employer, should not be used until the employer has had a reasonable opportunity to conduct an investigation or discovery of the employee's injuries and damages.
- (e) Additional interrogatories may be attached.

**Sec. 3. Instructions to the Answering Party**

- (a) You must answer or provide another appropriate response to each interrogatory that has been checked below.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

- (c) Each answer must be as complete and straightforward as the information reasonably available to you permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:  
*I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.*

(DATE)

(SIGNATURE)

**Sec. 4. Definitions**Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

- (a) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

- (b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.
- (c) **EMPLOYMENT** means a relationship in which an **EMPLOYEE** provides services requested by or on behalf of an **EMPLOYER**, other than an independent contractor relationship.
- (d) **EMPLOYEE** means a **PERSON** who provides services in an **EMPLOYMENT** relationship and who is a party to this lawsuit. For purposes of these interrogatories, **EMPLOYEE** refers to (insert name): MOLLY PAIGE

(If no name is inserted, **EMPLOYEE** means all such **PERSONS**.)

- (e) **EMPLOYER** means a **PERSON** who employs an **EMPLOYEE** to provide services in an **EMPLOYMENT** relationship and who is a party to this lawsuit. For purposes of these interrogatories, **EMPLOYER** refers to (insert name):  
Pacifica Foundation, KPFF Los Angeles 90.7 FM,  
dba Pacifica Radio - KPFF 90.7  
(If no name is inserted, **EMPLOYER** means all such **PERSONS**.)
- (f) **ADVERSE EMPLOYMENT ACTION** means any **TERMINATION**, suspension, demotion, reprimand, loss of pay, failure or refusal to hire, failure or refusal to promote, or other action or failure to act that adversely affects the **EMPLOYEE'S** rights or interests and which is alleged in the **PLEADINGS**.
- (g) **TERMINATION** means the actual or constructive termination of employment and includes a discharge, firing, layoff, resignation, or completion of the term of the employment agreement.
- (h) **PUBLISH** means to communicate orally or in writing to anyone other than the plaintiff. This includes communications by one of the defendant's employees to others. (*Kelly v. General Telephone Co.* (1982) 136 Cal.App.3d 278, 284.)
- (i) **PLEADINGS** means the original or most recent amended version of any complaint, answer, cross-complaint, or answer to cross-complaint.
- (j) **BENEFIT** means any benefit from an **EMPLOYER**, including an "employee welfare benefit plan" or "employee pension benefit plan" within the meaning of Title 29 United States Code section 1002(1) or (2) or ERISA.
- (k) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).
- (l) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.
- (m) **ADDRESS** means the street address, including the city, state, and zip code.

## Sec. 5. Interrogatories

The following interrogatories for employment law cases have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

### CONTENTS

- 200.0 Contract Formation
- 201.0 Adverse Employment Action
- 202.0 Discrimination Interrogatories to Employee
- 203.0 Harassment Interrogatories to Employee
- 204.0 Disability Discrimination
- 205.0 Discharge in Violation of Public Policy
- 206.0 Defamation
- 207.0 Internal Complaints
- 208.0 Governmental Complaints
- 209.0 Other Employment Claims by Employee or Against Employer
- 210.0 Loss of Income Interrogatories to Employee
- 211.0 Loss of Income Interrogatories to Employer
- 212.0 Physical, Mental, or Emotional Injuries—Interrogatories to Employee
- 213.0 Other Damages Interrogatories to Employee
- 214.0 Insurance
- 215.0 Investigation
- 216.0 Denials and Special or Affirmative Defenses
- 217.0 Response to Request for Admissions

### 200.0 Contract Formation

- ☐ 200.1 Do you contend that the **EMPLOYMENT** relationship was at "at will"? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.
- ☐ 200.2 Do you contend that the **EMPLOYMENT** relationship was not "at will"? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.
- ☒ 200.3 Do you contend that the **EMPLOYMENT** relationship was governed by any agreement—written, oral, or implied? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.



☒ 200.4 Was any part of the parties' **EMPLOYMENT** relationship governed in whole or in part by any written rules, guidelines, policies, or procedures established by the **EMPLOYER**? If so, for each **DOCUMENT** containing the written rules, guidelines, policies, or procedures:

- (a) state the date and title of the **DOCUMENT** and a general description of its contents;
- (b) state the manner in which the **DOCUMENT** was communicated to employees; and
- (c) state the manner, if any, in which employees acknowledged either receipt of the **DOCUMENT** or knowledge of its contents.

☒ 200.5 Was any part of the parties' **EMPLOYMENT** relationship covered by one or more collective bargaining agreements or memorandums of understanding between the **EMPLOYER** (or an association of employers) and any labor union or employee association? If so, for each collective bargaining agreement or memorandum of understanding, state:

- (a) the names and **ADDRESSES** of the parties to the collective bargaining agreement or memorandum of understanding;
- (b) the beginning and ending dates, if applicable, of the collective bargaining agreement or memorandum of understanding; and
- (c) which parts of the collective bargaining agreement or memorandum of understanding, if any, govern (1) any dispute or claim referred to in the **PLEADINGS** and (2) the rules or procedures for resolving any dispute or claim referred to in the **PLEADINGS**.

☒ 200.6 Do you contend that the **EMPLOYEE** and the **EMPLOYER** were in a business relationship other than an **EMPLOYMENT** relationship? If so, for each relationship:

- (a) state the names of the parties to the relationship;
- (b) identify the relationship; and
- (c) state all facts upon which you base your contention that the parties were in a relationship other than an **EMPLOYMENT** relationship.

## 201.0 Adverse Employment Action

☐ 201.1 Was the **EMPLOYEE** involved in a **TERMINATION**? If so:

- (a) state all reasons for the **EMPLOYEE'S** **TERMINATION**;
- (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who participated in the **TERMINATION** decision;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who provided any information relied upon in the **TERMINATION** decision; and
- (d) identify all **DOCUMENTS** relied upon in the **TERMINATION** decision.

☐ 201.2 Are there any facts that would support the **EMPLOYEE'S** **TERMINATION** that were first discovered after the **TERMINATION**? If so:

- (a) state the specific facts;
- (b) state when and how **EMPLOYER** first learned of each specific fact;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of the specific facts; and
- (d) identify all **DOCUMENTS** that evidence these specific facts.

☒ 201.3 Were there any other **ADVERSE** **EMPLOYMENT ACTIONS**, including (the asking party should list the **ADVERSE** **EMPLOYMENT ACTIONS**): The action alleged in Paragraph 62 of the First Amended Complaint.

If so, for each action, provide the following:

- (a) all reasons for each **ADVERSE** **EMPLOYMENT ACTION**;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who participated in making each **ADVERSE** **EMPLOYMENT ACTION** decision;
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who provided any information relied upon in making each **ADVERSE** **EMPLOYMENT ACTION** decision; and
- (d) the identity of all **DOCUMENTS** relied upon in making each **ADVERSE** **EMPLOYMENT ACTION** decision.

☒ 201.4 Was the **TERMINATION** or any other **ADVERSE** **EMPLOYMENT ACTIONS** referred to in Interrogatories 201.1 through 201.3 based in whole or in part on the **EMPLOYEE'S** job performance? If so, for each action:

- (a) identify the **ADVERSE** **EMPLOYMENT ACTION**;
- (b) identify the **EMPLOYEE'S** specific job performance that played a role in that **ADVERSE** **EMPLOYMENT ACTION**;
- (c) identify any rules, guidelines, policies, or procedures that were used to evaluate the **EMPLOYEE'S** specific job performance;
- (d) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who had responsibility for evaluating the specific job performance of the **EMPLOYEE**;
- (e) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the **EMPLOYEE'S** specific job performance that played a role in that **ADVERSE** **EMPLOYMENT ACTION**; and
- (f) describe all warnings given with respect to the **EMPLOYEE'S** specific job performance.

☐ 201.5 Was any PERSON hired to replace the EMPLOYEE after the EMPLOYEE'S TERMINATION or demotion? If so, state the PERSON'S name, job title, qualifications, ADDRESS and telephone number, and the date the PERSON was hired.

☐ 201.6 Has any PERSON performed any of the EMPLOYEE'S former job duties after the EMPLOYEE'S TERMINATION or demotion? If so:

- (a) state the PERSON'S name, job title, ADDRESS, and telephone number;
- (b) identify the duties; and
- (c) state the date on which the PERSON started to perform the duties.

☒ 201.7 If the ADVERSE EMPLOYMENT ACTION involved the failure or refusal to select the EMPLOYEE (for example, for hire, promotion, transfer, or training), was any other PERSON selected instead? If so, for each ADVERSE EMPLOYMENT ACTION, state the name, ADDRESS, and telephone number of each PERSON selected; the date the PERSON was selected; and the reason the PERSON was selected instead of the EMPLOYEE.

## 202.0 Discrimination—Interrogatories to Employee

☐ 202.1 Do you contend that any ADVERSE EMPLOYMENT ACTIONS against you were discriminatory? If so:

- (a) identify each ADVERSE EMPLOYMENT ACTION that involved unlawful discrimination;
- (b) identify each characteristic (for example, gender, race, age, etc.) on which you base your claim or claims of discrimination;
- (c) state all facts upon which you base each claim of discrimination;
- (d) state the name, ADDRESS, and telephone number of each PERSON with knowledge of those facts; and
- (e) identify all DOCUMENTS evidencing those facts.

☐ 202.2 State all facts upon which you base your contention that you were qualified to perform any job which you contend was denied to you on account of unlawful discrimination.

## 203.0 Harassment—Interrogatories to Employee

☐ 203.1 Do you contend that you were unlawfully harassed in your employment? If so:

- (a) state the name, ADDRESS, telephone number, and employment position of each PERSON whom you contend harassed you;
- (b) for each PERSON whom you contend harassed you, describe the harassment;

- (c) identify each characteristic (for example, gender, race, age, etc.) on which you base your claim of harassment;
- (d) state all facts upon which you base your contention that you were unlawfully harassed;
- (e) state the name, ADDRESS, and telephone number of each PERSON with knowledge of those facts; and
- (f) identify all DOCUMENTS evidencing those facts.

## 204.0 Disability Discrimination

☐ 204.1 Name and describe each disability alleged in the PLEADINGS.

☐ 204.2 Does the EMPLOYEE allege any injury or illness that arose out of or in the course of EMPLOYMENT? If so, state:

- (a) the nature of such injury or illness;
- (b) how such injury or illness occurred;
- (c) the date on which such injury or illness occurred;
- (d) whether EMPLOYEE has filed a workers' compensation claim. If so, state the date and outcome of the claim; and
- (e) whether EMPLOYEE has filed or applied for disability benefits of any type. If so, state the date, identify the nature of the benefits applied for, and the outcome of any such application.

☐ 204.3 Were there any communications between the EMPLOYEE (or the EMPLOYEE'S HEALTH CARE PROVIDER) and the EMPLOYER about the type or extent of any disability of EMPLOYEE? If so:

- (a) state the name, ADDRESS, and telephone number of each person who made or received the communications;
- (b) state the name, ADDRESS, and telephone number of each PERSON who witnessed the communications;
- (c) describe the date and substance of the communications; and
- (d) identify each DOCUMENT that refers to the communications.

☐ 204.4 Did the EMPLOYER have any information about the type, existence, or extent of any disability of EMPLOYEE other than from communications with the EMPLOYEE or the EMPLOYEE'S HEALTH CARE PROVIDER? If so, state the sources and substance of that information and the name, ADDRESS, and telephone number of each PERSON who provided or received the information.

☐ 204.5 Did the EMPLOYEE need any accommodation to perform any function of the EMPLOYEE'S job position or need a transfer to another position as an accommodation? If so, describe the accommodations needed.

☐ 204.6 Were there any communications between the **EMPLOYEE** (or the **EMPLOYEE'S HEALTH CARE PROVIDER**) and the **EMPLOYER** about any possible accommodation of **EMPLOYEE**? If so, for each communication:

- (a) state the name, **ADDRESS**, and telephone number of each **PERSON** who made or received the communication;
- (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who witnessed the communication;
- (c) describe the date and substance of the communication; and
- (d) identify each **DOCUMENT** that refers to the communication.

☐ 204.7 What did the **EMPLOYER** consider doing to accommodate the **EMPLOYEE**? For each accommodation considered:

- (a) describe the accommodation considered;
- (b) state whether the accommodation was offered to the **EMPLOYEE**;
- (c) state the **EMPLOYEE'S** response; or
- (d) if the accommodation was not offered, state all the reasons why this decision was made;
- (e) state the name, **ADDRESS**, and telephone number of each **PERSON** who on behalf of **EMPLOYER** made any decision about what accommodations, if any, to make for the **EMPLOYEE**; and
- (f) state the name, **ADDRESS**, and telephone number of each **PERSON** who on behalf of the **EMPLOYER** made or received any communications about what accommodations, if any, to make for the **EMPLOYEE**.

## 205.0 Discharge in Violation of Public Policy

☐ 205.1 Do you contend that the **EMPLOYER** took any **ADVERSE EMPLOYMENT ACTION** against you in violation of public policy? If so:

- (a) identify the constitutional provision, statute, regulation, or other source of the public policy that you contend was violated; and
- (b) state all facts upon which you base your contention that the **EMPLOYER** violated public policy.

## 206.0 Defamation

☐ 206.1 Did the **EMPLOYER'S** agents or employees **PUBLISH** any of the allegedly defamatory statements identified in the **PLEADINGS**? If so, for each statement:

- (a) identify the **PUBLISHED** statement;
- (b) state the name, **ADDRESS**, telephone number, and job title of each person who **PUBLISHED** the statement;
- (c) state the name, **ADDRESS**, and telephone number of each person to whom the statement was **PUBLISHED**;

- (d) state whether, at the time the statement was **PUBLISHED**, the **PERSON** who **PUBLISHED** the statement believed it to be true; and
- (e) state all facts upon which the **PERSON** who published the statement based the belief that it was true.

☐ 206.2 State the name and **ADDRESS** of each agent or employee of the **EMPLOYER** who responded to any inquiries regarding the **EMPLOYEE** after the **EMPLOYEE'S TERMINATION**.

☐ 206.3 State the name and **ADDRESS** of the recipient and the substance of each post-**TERMINATION** statement **PUBLISHED** about **EMPLOYEE** by any agent or employee of **EMPLOYER**.

## 207.0 Internal Complaints

☒ 207.1 Were there any internal written policies or regulations of the **EMPLOYER** that apply to the making of a complaint of the type that is the subject matter of this lawsuit? If so:

- (a) state the title and date of each **DOCUMENT** containing the policies or regulations and a general description of the **DOCUMENT'S** contents;
- (b) state the manner in which the **DOCUMENT** was communicated to **EMPLOYEES**;
- (c) state the manner, if any, in which **EMPLOYEES** acknowledged receipt of the **DOCUMENT** or knowledge of its contents, or both;
- (d) state, if you contend that the **EMPLOYEE** failed to use any available internal complaint procedures, all facts that support that contention; and
- (e) state, if you contend that the **EMPLOYEE'S** failure to use internal complaint procedures was excused, all facts why the **EMPLOYEE'S** use of the procedures was excused.

☒ 207.2 Did the **EMPLOYEE** complain to the **EMPLOYER** about any of the unlawful conduct alleged in the **PLEADINGS**? If so, for each complaint:

- (a) state the date of the complaint;
- (b) state the nature of the complaint;
- (c) state the name and **ADDRESS** of each **PERSON** to whom the complaint was made;
- (d) state the name, **ADDRESS**, telephone number, and job title of each **PERSON** who investigated the complaint;
- (e) state the name, **ADDRESS**, telephone number, and job title of each **PERSON** who participated in making decisions about how to conduct the investigation;

- (f) state the name, ADDRESS, telephone number, and job title of each PERSON who was interviewed or who provided an oral or written statement as part of the investigation of the complaint;
- (g) state the nature and date of any action taken in response to the complaint;
- (h) state whether the EMPLOYEE who made the complaint was made aware of the actions taken by the EMPLOYER in response to the complaint, and, if so, state how and when;
- (i) identify all DOCUMENTS relating to the complaint, the investigation, and any action taken in response to the complaint; and
- (j) state the name, ADDRESS, and telephone number of each PERSON who has knowledge of the EMPLOYEE'S complaint or the EMPLOYER'S response to the complaint.

#### 208.0 Governmental Complaints

- ☒ 208.1 Did the EMPLOYEE file a claim, complaint, or charge with any governmental agency that involved any of the material allegations made in the PLEADINGS? If so, for each claim, complaint, or charge:
- (a) state the date on which it was filed;
  - (b) state the name and ADDRESS of the agency with which it was filed;
  - (c) state the number assigned to the claim, complaint, or charge by the agency;
  - (d) state the nature of each claim, complaint, or charge made;
  - (e) state the date on which the EMPLOYER was notified of the claim, complaint, or charge;
  - (f) state the name, ADDRESS, and telephone number of all PERSONS within the governmental agency with whom the EMPLOYER has had any contact or communication regarding the claim, complaint, or charge;
  - (g) state whether a right to sue notice was issued and, if so, when; and
  - (h) state whether any findings or conclusions regarding the complaint or charge have been made, and, if so, the date and description of the agency's findings or conclusions.
- ☒ 208.2 Did the EMPLOYER respond to any claim, complaint, or charge identified in Interrogatory 208.1? If so, for each claim, complaint, or charge:
- (a) state the nature and date of any investigation done or any other action taken by the EMPLOYER in response to the claim, complaint, or charge;
  - (b) state the name, ADDRESS, telephone number, and job title of each person who investigated the claim, complaint, or charge;
  - (c) state the name, ADDRESS, telephone number, and job title of each PERSON who participated in making decisions about how to conduct the investigation; and

- (d) state the name, ADDRESS, telephone number, and job title of each PERSON who was interviewed or who provided an oral or written statement as part of the investigation.

#### 209.0 Other Employment Claims by Employee or Against Employer

- ☐ 209.1 Except for this action, in the past 10 years has the EMPLOYEE filed a civil action against any employer regarding the EMPLOYEE'S employment? If so, for each civil action:
- (a) state the name, ADDRESS, and telephone number of each employer against whom the action was filed;
  - (b) state the court, names of the parties, and case number of the civil action;
  - (c) state the name, ADDRESS, and telephone number of any attorney representing the EMPLOYEE; and
  - (d) state whether the action has been resolved or is pending.
- ☒ 209.2 Except for this action, in the past 10 years has any employee filed a civil action against the EMPLOYER regarding his or her employment? If so, for each civil action:
- (a) state the name, ADDRESS, and telephone number of each employee who filed the action;
  - (b) state the court, names of the parties, and case number of the civil action;
  - (c) state the name, ADDRESS, and telephone number of any attorney representing the EMPLOYER; and
  - (d) state whether the action has been resolved or is pending.

#### 210.0 Loss of Income—Interrogatories to Employee

- ☐ 210.1 Do you attribute any loss of income, benefits, or earning capacity to any ADVERSE EMPLOYMENT ACTION? (If your answer is "no," do not answer Interrogatories 210.2 through 210.6.)
- ☐ 210.2 State the total amount of income, benefits, or earning capacity you have lost to date and how the amount was calculated.
- ☐ 210.3 Will you lose income, benefits, or earning capacity in the future as a result of any ADVERSE EMPLOYMENT ACTION? If so, state the total amount of income, benefits, or earning capacity you expect to lose, and how the amount was calculated.
- ☐ 210.4 Have you attempted to minimize the amount of your lost income? If so, describe how; if not, explain why not.

☐ 210.5 Have you purchased any benefits to replace any benefits to which you would have been entitled if the **ADVERSE EMPLOYMENT ACTION** had not occurred? If so, state the cost for each benefit purchased.

☐ 210.6 Have you obtained other employment since any **ADVERSE EMPLOYMENT ACTION**? If so, for each new employment:

- (a) state when the new employment commenced;
- (b) state the hourly rate or monthly salary for the new employment; and
- (c) state the benefits available from the new employment.

**211.0 Loss of Income—Interrogatories to Employer**  
[See instruction 2(d).]

☒ 211.1 Identify each type of **BENEFIT** to which the **EMPLOYEE** would have been entitled, from the date of the **ADVERSE EMPLOYMENT ACTION** to the present, if the **ADVERSE EMPLOYMENT ACTION** had not happened and the **EMPLOYEE** had remained in the same job position. For each type of benefit, state the amount the **EMPLOYER** would have paid to provide the benefit for the **EMPLOYEE** during this time period and the value of the **BENEFIT** to the **EMPLOYEE**.

☐ 211.2 Do you contend that the **EMPLOYEE** has not made reasonable efforts to minimize the amount of the **EMPLOYEE'S** lost income? If so:

- (a) describe what more **EMPLOYEE** should have done;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts that support your contention; and
- (c) identify all **DOCUMENTS** that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☐ 211.3 Do you contend that any of the lost income claimed by the **EMPLOYEE**, as disclosed in discovery thus far in this case, is unreasonable or was not caused by the **ADVERSE EMPLOYMENT ACTION**? If so:

- (a) state the amount of claimed lost income that you dispute;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

**212.0 Physical, Mental, or Emotional Injuries—**  
**Interrogatories to Employee**

☐ 212.1 Do you attribute any physical, mental, or emotional injuries to the **ADVERSE EMPLOYMENT ACTION**? (If your answer is "no," do not answer Interrogatories 212.2 through 212.7.)

☐ 212.2 Identify each physical, mental, or emotional injury that you attribute to the **ADVERSE EMPLOYMENT ACTION** and the area of your body affected.

☐ 212.3 Do you still have any complaints of physical, mental, or emotional injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each complaint state:

- (a) a description of the injury;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

☐ 212.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure section 2034) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

☐ 212.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each medication state:

- (a) the name of the medication;
- (b) the name, **ADDRESS** and telephone number of the **PERSON** who prescribed or furnished it;
- (c) the date prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

☐ 212.6 Are there any other medical services not previously listed in response to interrogatory 212.4 (for example, ambulance, nursing, prosthetics) that you received for injuries attributed to the **ADVERSE EMPLOYMENT ACTION**? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**.

- ☐ 212.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each injury state:
- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
  - (b) the complaints for which the treatment was advised; and
  - (c) the nature, duration, and estimated cost of the treatment.

#### 213.0 Other Damages—Interrogatories to Employee

- ☐ 213.1 Are there any other damages that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each item of damage state:
- (a) the nature;
  - (b) the date it occurred;
  - (c) the amount; and
  - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of the nature or amount of the damage.
- ☐ 213.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in Interrogatory 213.1? If so, identify the **DOCUMENTS** and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

#### 214.0 Insurance

- ☒ 214.1 At the time of the **ADVERSE EMPLOYMENT ACTION**, was there in effect any policy of insurance through which you were or might be insured in any manner for the damages, claims, or actions that have arisen out of the **ADVERSE EMPLOYMENT ACTION**? If so, for each policy state:
- (a) the kind of coverage;
  - (b) the name and **ADDRESS** of the insurance company;
  - (c) the name, **ADDRESS**, and telephone number of each named insured;
  - (d) the policy number;
  - (e) the limits of coverage for each type of coverage contained in the policy;
  - (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
  - (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.

- ☒ 214.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **ADVERSE EMPLOYMENT ACTION**? If so, specify the statute.

#### 215.0 Investigation

- ☒ 215.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **ADVERSE EMPLOYMENT ACTION**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
  - (b) the date of the interview; and
  - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- ☒ 215.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **ADVERSE EMPLOYMENT ACTION**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
  - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
  - (c) the date the statement was obtained; and
  - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

#### 216.0 Denials and Special or Affirmative Defenses

- ☒ 216.1 Identify each denial of a material allegation and each special or affirmative defense in your **PLEADINGS** and for each:
- (a) state all facts upon which you base the denial or special or affirmative defense;
  - (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
  - (c) identify all **DOCUMENTS** and all other tangible things, that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

#### 217.0 Response to Request for Admissions

- ☐ 217.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:
- (a) state the number of the request;
  - (b) state all facts upon which you base your response;
  - (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
  - (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

1 PROOF OF SERVICE

2 I am employed in the County of Los Angeles, State of California. I am over the age of  
3 18 and not a party to the within action; my business address is 11620 Wilshire Blvd., Suite 340,  
Los Angeles, CA 90025-1769.

4 On April 4, 2007, I served the foregoing **EMPLOYMENT FORM**  
5 **INTERROGATORIES, SET ONE** by placing true copies thereof enclosed in sealed  
envelopes addressed as follows:

6 Daniel Siegel, Esq.  
7 Siegel & Yee  
8 499 14th Street, Suite 220  
9 Oakland, CA 94612  
10 Telephone: (510) 839-1200  
11 Fax: (510) 444-6698

12 Attorneys for Defendants PACIFICA FOUNDATION, KPFK LOS ANGELES 90.7 FM  
13 dba PACIFICA RADIO - KPFK 90.7 FM, EVA GEORGIA, an individual

14 ☐ **BY MAIL** As follows: I am "readily familiar" with the firms practice of collection and  
15 processing correspondence for mailing. Under that practice it would be deposited with  
16 U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles,  
17 California in the ordinary course of business. I am aware that on motion of the party  
served, service is presumed invalid if postal cancellation date or postage meter date is  
more than one day after date of deposit for mailing in affidavit.

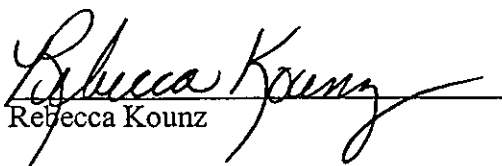
18 ☒ **BY FEDERAL EXPRESS** I am "readily familiar" with the firm's practice of collection  
19 and processing correspondence for deposit with Federal Express. Under that practice it  
20 would be deposited with Federal Express on that same day with fees thereon fully  
21 prepaid at Los Angeles, California in the ordinary course of business. I am aware that on  
22 motion of the party served, service is presumed invalid if date of receipt of the document  
23 by Federal Express is more than one day after date of deposit for mailing in affidavit.

24 ☐ **BY FACSIMILE MACHINE** I transmitted from a facsimile transmission machine  
25 whose telephone number is (310) 235-1707 to the above-identified recipient and fax  
26 telephone number. The above-described transmission was reported as complete without  
27 error by a transmission report issued by the facsimile transmission machine upon which  
28 the said transmission was made immediately following the transmission.

☐ **BY PERSONAL SERVICE** I delivered such envelope by hand to the above-identified  
recipient.

☒ **STATE** I declare under penalty of perjury under the laws of the State of California that  
the foregoing is true and correct.

Executed on April 4, 2007 at Los Angeles, California.

24  
25  
26  
27  
28  
  
Rebecca Kounz

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

PHILIP J. GANZ, JR., APC (SBN 57069)

LAURIE SUSAN GORSLINE (SBN 125650)

GANZ & GORSLINE, ALP

11620 Wilshire Blvd., Suite 340

Los Angeles, CA 90025

TELEPHONE NO: (310) 235-1700

FAX NO. (Optional): (310) 235-1707

E-MAIL ADDRESS (Optional):

ATTORNEY FOR (Name): Plaintiff Molly Paige

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STANLEY MOSK COURTHOUSE

SHORT TITLE: PAIGE v. PACIFICA FOUNDATION, et al.

**FORM INTERROGATORIES – EMPLOYMENT LAW**

Asking Party: Plaintiff MOLLY PAIGE

Answering Party: Defendant PACIFICA FOUNDATION

Set No.: ONE

CASE NUMBER:

BC365777

**Sec. 1. Instructions to All Parties**

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in employment cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

**Sec. 2. Instructions to the Asking Party**

- (a) These form interrogatories are designed for optional use by parties in employment cases. (Separate sets of interrogatories, *Form Interrogatories—General* (form DISC-001) and *Form Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004) may also be used where applicable in employment cases.)
- (b) Insert the names of the **EMPLOYEE** and **EMPLOYER** to whom these interrogatories apply in the definitions in sections 4(d) and (e) below.
- (c) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (d) The interrogatories in section 211.0, Loss of Income Interrogatories to Employer, should not be used until the employer has had a reasonable opportunity to conduct an investigation or discovery of the employee's injuries and damages.
- (e) Additional interrogatories may be attached.

**Sec. 3. Instructions to the Answering Party**

- (a) You must answer or provide another appropriate response to each interrogatory that has been checked below.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

- (c) Each answer must be as complete and straightforward as the information reasonably available to you permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:  
*I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.*

(DATE)

(SIGNATURE)

**Sec. 4. Definitions**

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

- (a) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

2



- (b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.
- (c) **EMPLOYMENT** means a relationship in which an **EMPLOYEE** provides services requested by or on behalf of an **EMPLOYER**, other than an independent contractor relationship.
- (d) **EMPLOYEE** means a **PERSON** who provides services in an **EMPLOYMENT** relationship and who is a party to this lawsuit. For purposes of these interrogatories, **EMPLOYEE** refers to (insert name): MOLLY PAIGE

(If no name is inserted, **EMPLOYEE** means all such **PERSONS**.)

- (e) **EMPLOYER** means a **PERSON** who employs an **EMPLOYEE** to provide services in an **EMPLOYMENT** relationship and who is a party to this lawsuit. For purposes of these interrogatories, **EMPLOYER** refers to (insert name): Pacifica Foundation, KPFK Los Angeles 90.7 FM, dba Pacifica Radio - KPFK 90.7  
(If no name is inserted, **EMPLOYER** means all such **PERSONS**.)

- (f) **ADVERSE EMPLOYMENT ACTION** means any **TERMINATION**, suspension, demotion, reprimand, loss of pay, failure or refusal to hire, failure or refusal to promote, or other action or failure to act that adversely affects the **EMPLOYEE'S** rights or interests and which is alleged in the **PLEADINGS**.

- (g) **TERMINATION** means the actual or constructive termination of employment and includes a discharge, firing, layoff, resignation, or completion of the term of the employment agreement.

- (h) **PUBLISH** means to communicate orally or in writing to anyone other than the plaintiff. This includes communications by one of the defendant's employees to others. (*Kelly v. General Telephone Co.* (1982) 136 Cal.App.3d 278, 284.)

- (i) **PLEADINGS** means the original or most recent amended version of any complaint, answer, cross-complaint, or answer to cross-complaint.

- (j) **BENEFIT** means any benefit from an **EMPLOYER**, including an "employee welfare benefit plan" or "employee pension benefit plan" within the meaning of Title 29 United States Code section 1002(1) or (2) or ERISA.

- (k) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

- (l) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

- (n) **ADDRESS** means the street address, including the city, state, and zip code.

## Sec. 5. Interrogatories

The following interrogatories for employment law cases have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

### CONTENTS

- 200.0 Contract Formation
- 201.0 Adverse Employment Action
- 202.0 Discrimination Interrogatories to Employee
- 203.0 Harassment Interrogatories to Employee
- 204.0 Disability Discrimination
- 205.0 Discharge in Violation of Public Policy
- 206.0 Defamation
- 207.0 Internal Complaints
- 208.0 Governmental Complaints
- 209.0 Other Employment Claims by Employee or Against Employer
- 210.0 Loss of Income Interrogatories to Employee
- 211.0 Loss of Income Interrogatories to Employer
- 212.0 Physical, Mental, or Emotional Injuries—Interrogatories to Employee
- 213.0 Other Damages Interrogatories to Employee
- 214.0 Insurance
- 215.0 Investigation
- 216.0 Denials and Special or Affirmative Defenses
- 217.0 Response to Request for Admissions

### 200.0 Contract Formation

- ☐ 200.1 Do you contend that the **EMPLOYMENT** relationship was at "at will"? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.

- ☐ 200.2 Do you contend that the **EMPLOYMENT** relationship was not "at will"? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.

- ☒ 200.3 Do you contend that the **EMPLOYMENT** relationship was governed by any agreement—written, oral, or implied? If so:
- (a) state all facts upon which you base this contention;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of those facts; and
  - (c) identify all **DOCUMENTS** that support your contention.

- ☒ 200.4 Was any part of the parties' **EMPLOYMENT** relationship governed in whole or in part by any written rules, guidelines, policies, or procedures established by the **EMPLOYER**? If so, for each **DOCUMENT** containing the written rules, guidelines, policies, or procedures:
- (a) state the date and title of the **DOCUMENT** and a general description of its contents;
  - (b) state the manner in which the **DOCUMENT** was communicated to employees; and
  - (c) state the manner, if any, in which employees acknowledged either receipt of the **DOCUMENT** or knowledge of its contents.

- ☒ 200.5 Was any part of the parties' **EMPLOYMENT** relationship covered by one or more collective bargaining agreements or memorandums of understanding between the **EMPLOYER** (or an association of employers) and any labor union or employee association? If so, for each collective bargaining agreement or memorandum of understanding, state:
- (a) the names and **ADDRESSES** of the parties to the collective bargaining agreement or memorandum of understanding;
  - (b) the beginning and ending dates, if applicable, of the collective bargaining agreement or memorandum of understanding; and
  - (c) which parts of the collective bargaining agreement or memorandum of understanding, if any, govern (1) any dispute or claim referred to in the **PLEADINGS** and (2) the rules or procedures for resolving any dispute or claim referred to in the **PLEADINGS**.

- ☒ 200.6 Do you contend that the **EMPLOYEE** and the **EMPLOYER** were in a business relationship other than an **EMPLOYMENT** relationship? If so, for each relationship:
- (a) state the names of the parties to the relationship;
  - (b) identify the relationship; and
  - (c) state all facts upon which you base your contention that the parties were in a relationship other than an **EMPLOYMENT** relationship.

#### 201.0 Adverse Employment Action

- ☐ 201.1 Was the **EMPLOYEE** involved in a **TERMINATION**? If so:
- (a) state all reasons for the **EMPLOYEE'S TERMINATION**;
  - (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who participated in the **TERMINATION** decision;
  - (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who provided any information relied upon in the **TERMINATION** decision; and
  - (d) identify all **DOCUMENTS** relied upon in the **TERMINATION** decision.

- ☐ 201.2 Are there any facts that would support the **EMPLOYEE'S TERMINATION** that were first discovered after the **TERMINATION**? If so:
- (a) state the specific facts;
  - (b) state when and how **EMPLOYER** first learned of each specific fact;
  - (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of the specific facts; and
  - (d) identify all **DOCUMENTS** that evidence these specific facts.

- ☒ 201.3 Were there any other **ADVERSE EMPLOYMENT ACTIONS**, including (the asking party should list the **ADVERSE EMPLOYMENT ACTIONS**): The action alleged in Paragraph 62 of the First Amended Complaint.

If so, for each action, provide the following:

- (a) all reasons for each **ADVERSE EMPLOYMENT ACTION**;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who participated in making each **ADVERSE EMPLOYMENT ACTION** decision;
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who provided any information relied upon in making each **ADVERSE EMPLOYMENT ACTION** decision; and
- (d) the identity of all **DOCUMENTS** relied upon in making each **ADVERSE EMPLOYMENT ACTION** decision.

- ☒ 201.4 Was the **TERMINATION** or any other **ADVERSE EMPLOYMENT ACTIONS** referred to in Interrogatories 201.1 through 201.3 based in whole or in part on the **EMPLOYEE'S** job performance? If so, for each action:
- (a) identify the **ADVERSE EMPLOYMENT ACTION**;
  - (b) identify the **EMPLOYEE'S** specific job performance that played a role in that **ADVERSE EMPLOYMENT ACTION**;
  - (c) identify any rules, guidelines, policies, or procedures that were used to evaluate the **EMPLOYEE'S** specific job performance;
  - (d) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who had responsibility for evaluating the specific job performance of the **EMPLOYEE**;
  - (e) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the **EMPLOYEE'S** specific job performance that played a role in that **ADVERSE EMPLOYMENT ACTION**; and
  - (f) describe all warnings given with respect to the **EMPLOYEE'S** specific job performance.

☐ 201.5 Was any **PERSON** hired to replace the **EMPLOYEE** after the **EMPLOYEE'S TERMINATION** or demotion? If so, state the **PERSON'S** name, job title, qualifications, **ADDRESS** and telephone number, and the date the **PERSON** was hired.

☐ 201.6 Has any **PERSON** performed any of the **EMPLOYEE'S** former job duties after the **EMPLOYEE'S TERMINATION** or demotion? If so:

- (a) state the **PERSON'S** name, job title, **ADDRESS**, and telephone number;
- (b) identify the duties; and
- (c) state the date on which the **PERSON** started to perform the duties.

☒ 201.7 If the **ADVERSE EMPLOYMENT ACTION** involved the failure or refusal to select the **EMPLOYEE** (for example, for hire, promotion, transfer, or training), was any other **PERSON** selected instead? If so, for each **ADVERSE EMPLOYMENT ACTION**, state the name, **ADDRESS**, and telephone number of each **PERSON** selected; the date the **PERSON** was selected; and the reason the **PERSON** was selected instead of the **EMPLOYEE**.

## 202.0 Discrimination—Interrogatories to Employee

☐ 202.1 Do you contend that any **ADVERSE EMPLOYMENT ACTIONS** against you were discriminatory? If so:

- (a) identify each **ADVERSE EMPLOYMENT ACTION** that involved unlawful discrimination;
- (b) identify each characteristic (for example, gender, race, age, etc.) on which you base your claim or claims of discrimination;
- (c) state all facts upon which you base each claim of discrimination;
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** with knowledge of those facts; and
- (e) identify all **DOCUMENTS** evidencing those facts.

☐ 202.2 State all facts upon which you base your contention that you were qualified to perform any job which you contend was denied to you on account of unlawful discrimination.

## 203.0 Harassment—Interrogatories to Employee

☐ 203.1 Do you contend that you were unlawfully harassed in your employment? If so:

- (a) state the name, **ADDRESS**, telephone number, and employment position of each **PERSON** whom you contend harassed you;
- (b) for each **PERSON** whom you contend harassed you, describe the harassment;

- (c) identify each characteristic (for example, gender, race, age, etc.) on which you base your claim of harassment;
- (d) state all facts upon which you base your contention that you were unlawfully harassed;
- (e) state the name, **ADDRESS**, and telephone number of each **PERSON** with knowledge of those facts; and
- (f) identify all **DOCUMENTS** evidencing those facts.

## 204.0 Disability Discrimination

☐ 204.1 Name and describe each disability alleged in the **PLEADINGS**.

☐ 204.2 Does the **EMPLOYEE** allege any injury or illness that arose out of or in the course of **EMPLOYMENT**? If so, state:

- (a) the nature of such injury or illness;
- (b) how such injury or illness occurred;
- (c) the date on which such injury or illness occurred;
- (d) whether **EMPLOYEE** has filed a workers' compensation claim. If so, state the date and outcome of the claim; and
- (e) whether **EMPLOYEE** has filed or applied for disability benefits of any type. If so, state the date, identify the nature of the benefits applied for, and the outcome of any such application.

☐ 204.3 Were there any communications between the **EMPLOYEE** (or the **EMPLOYEE'S HEALTH CARE PROVIDER**) and the **EMPLOYER** about the type or extent of any disability of **EMPLOYEE**? If so:

- (a) state the name, **ADDRESS**, and telephone number of each person who made or received the communications;
- (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who witnessed the communications;
- (c) describe the date and substance of the communications; and
- (d) identify each **DOCUMENT** that refers to the communications.

☐ 204.4 Did the **EMPLOYER** have any information about the type, existence, or extent of any disability of **EMPLOYEE** other than from communications with the **EMPLOYEE** or the **EMPLOYEE'S HEALTH CARE PROVIDER**? If so, state the sources and substance of that information and the name, **ADDRESS**, and telephone number of each **PERSON** who provided or received the information.

☐ 204.5 Did the **EMPLOYEE** need any accommodation to perform any function of the **EMPLOYEE'S** job position or need a transfer to another position as an accommodation? If so, describe the accommodations needed.

☐ 204.6 Were there any communications between the **EMPLOYEE** (or the **EMPLOYEE'S HEALTH CARE PROVIDER**) and the **EMPLOYER** about any possible accommodation of **EMPLOYEE**? If so, for each communication:

- (a) state the name, **ADDRESS**, and telephone number of each **PERSON** who made or received the communication;
- (b) state the name, **ADDRESS**, and telephone number of each **PERSON** who witnessed the communication;
- (c) describe the date and substance of the communication; and
- (d) identify each **DOCUMENT** that refers to the communication.

☐ 204.7 What did the **EMPLOYER** consider doing to accommodate the **EMPLOYEE**? For each accommodation considered:

- (a) describe the accommodation considered;
- (b) state whether the accommodation was offered to the **EMPLOYEE**;
- (c) state the **EMPLOYEE'S** response; or
- (d) if the accommodation was not offered, state all the reasons why this decision was made;
- (e) state the name, **ADDRESS**, and telephone number of each **PERSON** who on behalf of **EMPLOYER** made any decision about what accommodations, if any, to make for the **EMPLOYEE**; and
- (f) state the name, **ADDRESS**, and telephone number of each **PERSON** who on behalf of the **EMPLOYER** made or received any communications about what accommodations, if any, to make for the **EMPLOYEE**.

## 205.0 Discharge in Violation of Public Policy

☐ 205.1 Do you contend that the **EMPLOYER** took any **ADVERSE EMPLOYMENT ACTION** against you in violation of public policy? If so:

- (a) identify the constitutional provision, statute, regulation, or other source of the public policy that you contend was violated; and
- (b) state all facts upon which you base your contention that the **EMPLOYER** violated public policy.

## 206.0 Defamation

☐ 206.1 Did the **EMPLOYER'S** agents or employees **PUBLISH** any of the allegedly defamatory statements identified in the **PLEADINGS**? If so, for each statement:

- (a) identify the **PUBLISHED** statement;
- (b) state the name, **ADDRESS**, telephone number, and job title of each person who **PUBLISHED** the statement;
- (c) state the name, **ADDRESS**, and telephone number of each person to whom the statement was **PUBLISHED**;

- (d) state whether, at the time the statement was **PUBLISHED**, the **PERSON** who **PUBLISHED** the statement believed it to be true; and
- (e) state all facts upon which the **PERSON** who published the statement based the belief that it was true.

☐ 206.2 State the name and **ADDRESS** of each agent or employee of the **EMPLOYER** who responded to any inquiries regarding the **EMPLOYEE** after the **EMPLOYEE'S TERMINATION**.

☐ 206.3 State the name and **ADDRESS** of the recipient and the substance of each post-**TERMINATION** statement **PUBLISHED** about **EMPLOYEE** by any agent or employee of **EMPLOYER**.

## 207.0 Internal Complaints

☒ 207.1 Were there any internal written policies or regulations of the **EMPLOYER** that apply to the making of a complaint of the type that is the subject matter of this lawsuit? If so:

- (a) state the title and date of each **DOCUMENT** containing the policies or regulations and a general description of the **DOCUMENT'S** contents;
- (b) state the manner in which the **DOCUMENT** was communicated to **EMPLOYEES**;
- (c) state the manner, if any, in which **EMPLOYEES** acknowledged receipt of the **DOCUMENT** or knowledge of its contents, or both;
- (d) state, if you contend that the **EMPLOYEE** failed to use any available internal complaint procedures, all facts that support that contention; and
- (e) state, if you contend that the **EMPLOYEE'S** failure to use internal complaint procedures was excused, all facts why the **EMPLOYEE'S** use of the procedures was excused.

☒ 207.2 Did the **EMPLOYEE** complain to the **EMPLOYER** about any of the unlawful conduct alleged in the **PLEADINGS**? If so, for each complaint:

- (a) state the date of the complaint;
- (b) state the nature of the complaint;
- (c) state the name and **ADDRESS** of each **PERSON** to whom the complaint was made;
- (d) state the name, **ADDRESS**, telephone number, and job title of each **PERSON** who investigated the complaint;
- (e) state the name, **ADDRESS**, telephone number, and job title of each **PERSON** who participated in making decisions about how to conduct the investigation;

- (f) state the name, ADDRESS, telephone number, and job title of each PERSON who was interviewed or who provided an oral or written statement as part of the investigation of the complaint;
- (g) state the nature and date of any action taken in response to the complaint;
- (h) state whether the EMPLOYEE who made the complaint was made aware of the actions taken by the EMPLOYER in response to the complaint, and, if so, state how and when;
- (i) identify all DOCUMENTS relating to the complaint, the investigation, and any action taken in response to the complaint; and
- (j) state the name, ADDRESS, and telephone number of each PERSON who has knowledge of the EMPLOYEE'S complaint or the EMPLOYER'S response to the complaint.

#### 208.0 Governmental Complaints

- ☒ 208.1 Did the EMPLOYEE file a claim, complaint, or charge with any governmental agency that involved any of the material allegations made in the PLEADINGS? If so, for each claim, complaint, or charge:
- (a) state the date on which it was filed;
  - (b) state the name and ADDRESS of the agency with which it was filed;
  - (c) state the number assigned to the claim, complaint, or charge by the agency;
  - (d) state the nature of each claim, complaint, or charge made;
  - (e) state the date on which the EMPLOYER was notified of the claim, complaint, or charge;
  - (f) state the name, ADDRESS, and telephone number of all PERSONS within the governmental agency with whom the EMPLOYER has had any contact or communication regarding the claim, complaint, or charge;
  - (g) state whether a right to sue notice was issued and, if so, when; and
  - (h) state whether any findings or conclusions regarding the complaint or charge have been made, and, if so, the date and description of the agency's findings or conclusions.
- ☒ 208.2 Did the EMPLOYER respond to any claim, complaint, or charge identified in Interrogatory 208.1? If so, for each claim, complaint, or charge:
- (a) state the nature and date of any investigation done or any other action taken by the EMPLOYER in response to the claim, complaint, or charge;
  - (b) state the name, ADDRESS, telephone number, and job title of each person who investigated the claim, complaint, or charge;
  - (c) state the name, ADDRESS, telephone number, and job title of each PERSON who participated in making decisions about how to conduct the investigation; and

- (d) state the name, ADDRESS, telephone number, and job title of each PERSON who was interviewed or who provided an oral or written statement as part of the investigation.

#### 209.0 Other Employment Claims by Employee or Against Employer

- ☐ 209.1 Except for this action, in the past 10 years has the EMPLOYEE filed a civil action against any employer regarding the EMPLOYEE'S employment? If so, for each civil action:
- (a) state the name, ADDRESS, and telephone number of each employer against whom the action was filed;
  - (b) state the court, names of the parties, and case number of the civil action;
  - (c) state the name, ADDRESS, and telephone number of any attorney representing the EMPLOYEE; and
  - (d) state whether the action has been resolved or is pending.
- ☒ 209.2 Except for this action, in the past 10 years has any employee filed a civil action against the EMPLOYER regarding his or her employment? If so, for each civil action:
- (a) state the name, ADDRESS, and telephone number of each employee who filed the action;
  - (b) state the court, names of the parties, and case number of the civil action;
  - (c) state the name, ADDRESS, and telephone number of any attorney representing the EMPLOYER; and
  - (d) state whether the action has been resolved or is pending.

#### 210.0 Loss of Income—Interrogatories to Employee

- ☐ 210.1 Do you attribute any loss of income, benefits, or earning capacity to any ADVERSE EMPLOYMENT ACTION? (If your answer is "no," do not answer Interrogatories 210.2 through 210.6.)
- ☐ 210.2 State the total amount of income, benefits, or earning capacity you have lost to date and how the amount was calculated.
- ☐ 210.3 Will you lose income, benefits, or earning capacity in the future as a result of any ADVERSE EMPLOYMENT ACTION? If so, state the total amount of income, benefits, or earning capacity you expect to lose, and how the amount was calculated.
- ☐ 210.4 Have you attempted to minimize the amount of your lost income? If so, describe how; if not, explain why not.

☐ 210.5 Have you purchased any benefits to replace any benefits to which you would have been entitled if the **ADVERSE EMPLOYMENT ACTION** had not occurred? If so, state the cost for each benefit purchased.

☐ 210.6 Have you obtained other employment since any **ADVERSE EMPLOYMENT ACTION**? If so, for each new employment:

- (a) state when the new employment commenced;
- (b) state the hourly rate or monthly salary for the new employment; and
- (c) state the benefits available from the new employment.

**211.0 Loss of Income—Interrogatories to Employer**  
[See instruction 2(d).]

☒ 211.1 Identify each type of **BENEFIT** to which the **EMPLOYEE** would have been entitled, from the date of the **ADVERSE EMPLOYMENT ACTION** to the present, if the **ADVERSE EMPLOYMENT ACTION** had not happened and the **EMPLOYEE** had remained in the same job position. For each type of benefit, state the amount the **EMPLOYER** would have paid to provide the benefit for the **EMPLOYEE** during this time period and the value of the **BENEFIT** to the **EMPLOYEE**.

☐ 211.2 Do you contend that the **EMPLOYEE** has not made reasonable efforts to minimize the amount of the **EMPLOYEE'S** lost income? If so:

- (a) describe what more **EMPLOYEE** should have done;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts that support your contention; and
- (c) identify all **DOCUMENTS** that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☐ 211.3 Do you contend that any of the lost income claimed by the **EMPLOYEE**, as disclosed in discovery thus far in this case, is unreasonable or was not caused by the **ADVERSE EMPLOYMENT ACTION**? If so:

- (a) state the amount of claimed lost income that you dispute;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

**212.0 Physical, Mental, or Emotional Injuries—Interrogatories to Employee**

☐ 212.1 Do you attribute any physical, mental, or emotional injuries to the **ADVERSE EMPLOYMENT ACTION**? (If your answer is "no," do not answer Interrogatories 212.2 through 212.7.)

☐ 212.2 Identify each physical, mental, or emotional injury that you attribute to the **ADVERSE EMPLOYMENT ACTION** and the area of your body affected.

☐ 212.3 Do you still have any complaints of physical, mental, or emotional injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each complaint state:

- (a) a description of the injury;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

☐ 212.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure section 2034) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

☐ 212.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each medication state:

- (a) the name of the medication;
- (b) the name, **ADDRESS** and telephone number of the **PERSON** who prescribed or furnished it;
- (c) the date prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

☐ 212.6 Are there any other medical services not previously listed in response to interrogatory 212.4 (for example, ambulance, nursing, prosthetics) that you received for injuries attributed to the **ADVERSE EMPLOYMENT ACTION**? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**.

- ☐ 212.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each injury state:
- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
  - (b) the complaints for which the treatment was advised; and
  - (c) the nature, duration, and estimated cost of the treatment.

### 213.0 Other Damages—Interrogatories to Employee

- ☐ 213.1 Are there any other damages that you attribute to the **ADVERSE EMPLOYMENT ACTION**? If so, for each item of damage state:
- (a) the nature;
  - (b) the date it occurred;
  - (c) the amount; and
  - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has knowledge of the nature or amount of the damage.
- ☐ 213.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in Interrogatory 213.1? If so, identify the **DOCUMENTS** and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

### 214.0 Insurance

- ☒ 214.1 At the time of the **ADVERSE EMPLOYMENT ACTION**, was there in effect any policy of insurance through which you were or might be insured in any manner for the damages, claims, or actions that have arisen out of the **ADVERSE EMPLOYMENT ACTION**? If so, for each policy state:
- (a) the kind of coverage;
  - (b) the name and **ADDRESS** of the insurance company;
  - (c) the name, **ADDRESS**, and telephone number of each named insured;
  - (d) the policy number;
  - (e) the limits of coverage for each type of coverage contained in the policy;
  - (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
  - (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.
- ☒ 214.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **ADVERSE EMPLOYMENT ACTION**? If so, specify the statute.

### 215.0 Investigation

- ☒ 215.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **ADVERSE EMPLOYMENT ACTION**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
  - (b) the date of the interview; and
  - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- ☒ 215.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **ADVERSE EMPLOYMENT ACTION**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
  - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
  - (c) the date the statement was obtained; and
  - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

### 216.0 Denials and Special or Affirmative Defenses

- ☒ 216.1 Identify each denial of a material allegation and each special or affirmative defense in your **PLEADINGS** and for each:
- (a) state all facts upon which you base the denial or special or affirmative defense;
  - (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
  - (c) identify all **DOCUMENTS** and all other tangible things, that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

### 217.0 Response to Request for Admissions

- ☐ 217.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:
- (a) state the number of the request;
  - (b) state all facts upon which you base your response;
  - (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
  - (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

1 PROOF OF SERVICE

2 I am employed in the County of Los Angeles, State of California. I am over the age of  
3 18 and not a party to the within action; my business address is 11620 Wilshire Blvd., Suite 340,  
Los Angeles, CA 90025-1769.

4 On April 4, 2007, I served the foregoing **EMPLOYMENT FORM**  
5 **INTERROGATORIES, SET ONE** by placing true copies thereof enclosed in sealed  
envelopes addressed as follows:

6 Daniel Siegel, Esq.  
7 Siegel & Yee  
8 499 14th Street, Suite 220  
9 Oakland, CA 94612  
10 Telephone: (510) 839-1200  
11 Fax: (510) 444-6698

12 Attorneys for Defendants PACIFICA FOUNDATION, KPFFK LOS ANGELES 90.7 FM  
13 dba PACIFICA RADIO - KPFFK 90.7 FM, EVA GEORGIA, an individual

14 ☐ **BY MAIL** As follows: I am "readily familiar" with the firms practice of collection and  
15 processing correspondence for mailing. Under that practice it would be deposited with  
16 U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles,  
17 California in the ordinary course of business. I am aware that on motion of the party  
served, service is presumed invalid if postal cancellation date or postage meter date is  
more than one day after date of deposit for mailing in affidavit.

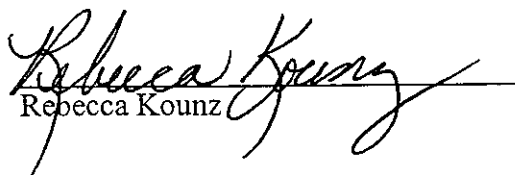
18 ☒ **BY FEDERAL EXPRESS** I am "readily familiar" with the firm's practice of collection  
19 and processing correspondence for deposit with Federal Express. Under that practice it  
20 would be deposited with Federal Express on that same day with fees thereon fully  
21 prepaid at Los Angeles, California in the ordinary course of business. I am aware that on  
22 motion of the party served, service is presumed invalid if date of receipt of the document  
23 by Federal Express is more than one day after date of deposit for mailing in affidavit.

24 ☐ **BY FACSIMILE MACHINE** I transmitted from a facsimile transmission machine  
25 whose telephone number is (310) 235-1707 to the above-identified recipient and fax  
26 telephone number. The above-described transmission was reported as complete without  
27 error by a transmission report issued by the facsimile transmission machine upon which  
28 the said transmission was made immediately following the transmission.

☐ **BY PERSONAL SERVICE** I delivered such envelope by hand to the above-identified  
recipient.

☒ **STATE** I declare under penalty of perjury under the laws of the State of California that  
the foregoing is true and correct.

Executed on April 4, 2007 at Los Angeles, California.

Rebecca Kounz  




**GANZ & GORSLINE** A LAW PARTNERSHIP

Philip J. Ganz, Jr.\*  
Laurie Susan Gorsline  
\*A Professional Corporation

May 3, 2007

Via Facsimile and U.S. Mail

Daniel Siegel, Esq.  
Siegel & Yee  
499 14th Street, Suite 220  
Oakland, CA 94612

Re: Molly Paige v. Pacifica Foundation, Eva Georgia, et al.

Dear Mr. Siegel:

I am in receipt of your letter of April 30, 2007 requesting an extension. While we normally give extensions and grant professional courtesies, we note for the record that previously when we requested both orally and in writing an extension of time to respond to the written discovery propounded on the Plaintiff, you simply and utterly ignored our request. However, we are willing to grant you an extension of time of 14 days, i.e. to and including May 24, 2007 in which to respond to the 13 sets of interrogatories and the one set of document requests.

In addition, I would like you to clarify that in the future you will reciprocate and grant us professional courtesies when we request them.

Very truly yours,

PHILIP J. GANZ, JR.

2007  
PJK/rk

Siegel Ltr.6.wpd

EXHIBIT

3

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

FACSIMILE COVER LETTER

May 3, 2007

TO: Daniel Siegel, Esq.  
Siegel & Yee

FACSIMILE: (510) 444-6698

TELEPHONE: (510) 839-1200

FROM: Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

SUBJECT: #5784 -Molly Paige v. Pacifica Foundation, etc. et al.

PAGE TOTAL: 2

MESSAGE:

CONFIDENTIAL TRANSMISSION

The information contained in this facsimile message is legally privileged and confidential information which is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please notify us by telephone and return the original message to us via U.S. Mail to the address listed above. Thank you.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 3025  
CONNECTION TEL 915104446698  
CONNECTION ID  
ST. TIME 05/03 14:34  
USAGE T 00'38  
PGS. SENT 2  
RESULT OK

*Christopher confirmed the fax*

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

May 3, 2007

TO: Daniel Siegel, Esq.  
Siegel & Yee

FACSIMILE: (510) 444-6698

TELEPHONE: (510) 839-1200

FROM: Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

SUBJECT: #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

PAGE TOTAL: 2

MESSAGE:

1620 Wilshire Boulevard, Suite 340  
Los Angeles, California 90025-1769  
E Mail: info@ganzgorslaw.com  
Website: www.ganzgorslaw.com  
Telephone: (310) 235-1700  
Facsimile: (310) 235-1707

**GANZ & GORSLINE** A LAW PARTNERSHIP

Philip J. Ganz, Jr.\*  
Laurie Susan Gorsline  
\*A Professional Corporation

June 8, 2007

Via Facsimile and U.S. Mail

Daniel Siegel, Esq.  
Siegel & Yee  
499 14th Street, Suite 220  
Oakland, CA 94612

Re: Molly Paige v. Pacifica Foundation, Eva Georgia, et al.

Dear Mr. Siegel:

As you know, we served Form Interrogatories (Sets 1-6), Employment Form Interrogatories (Set 1) and a First Request for Production of Documents on your clients on April 5, 2007. We also granted you an extension of time to respond to and including May 24, 2007. However, to date, we have received no responses or documents from you. As you know, by failing to respond on time, your clients have waived all objections. As you also know, your client's deposition is scheduled for next week. Accordingly, we would like to have all of the overdue responses without objection and all of the responsive documents in our office by no later than the close of business on Tuesday. We need these documents by then in order to aid in the preparation for and to take Eva Georgia's deposition next week. Thank you for your prompt attention to this matter.

Very truly yours,

  
LAURIE SUSAN GORSLINE

LSG/rlk

mclSiegel Ltr.wpd

EXHIBIT 4

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

June 8, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc. et al.

**PAGE TOTAL:** 2

**MESSAGE:** See attached.

**CONFIDENTIAL TRANSMISSION**

The information contained in this facsimile message is legally privileged and confidential information which is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please notify us by telephone and return the original message to us via U.S. Mail to the address listed above. Thank you.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 3189  
CONNECTION TEL 915104446698  
CONNECTION ID  
ST. TIME 06/08 16:30  
USAGE T 00'39  
PGS. SENT 2  
RESULT OK

*Left a message on Mr. Siegel's voice mail.*

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

June 8, 2007

TO: Daniel Siegel, Esq.  
Siegel & Yee

FACSIMILE: (510) 444-6698

TELEPHONE: (510) 839-1200

FROM: Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

SUBJECT: #5784 -Molly Paige v. Pacifica Foundation, etc. et al.

PAGE TOTAL: 2

MESSAGE: See attached.



ATTORNEYS AT LAW

♦ DAN SIEGEL  
♦ ALAN S. YEE  
♦ JANE BRUNNER  
♦ JOSE LUIS  
FUENTES

♦ TANYA RUSSELL  
♦ DEAN ROYER

OF COUNSEL

♦ ANNE  
BUTTERFIELD  
WELLS

June 8, 2007

Via Facsimile to (310) 235-1707

Philip J. Ganz, Jr.  
Ganz & Gorsline, ALP  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025

Re: Paige v. Pacifica Foundation, Eva Georgia  
Los Angeles County Superior Court No. BC365777

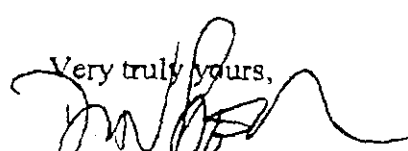
Dear Mr. Ganz:

My trial in Fresno is going forward. We will not be able to produce Eva Georgia for a deposition on June 14-15. The judge has told the jury that the trial will be over by July 4. He may be correct.

I am working with my clients to respond to your interrogatories and document requests. I am hopeful that we will be able to provide you with at least partial responses within the next 10 days.

Thank you for your consideration in this matter.

Very truly yours,

  
DAN SIEGEL

10/11/07

1 DAN SIEGEL, SBN 056400  
2 SIEGEL & YEE  
3 499 14<sup>th</sup> Street, Suite 220  
4 Oakland, CA 94612  
5 Tel. (510) 839-1200  
6 Telefax. (510) 444-6698

7  
8  
9 Attorneys for Defendants  
10 PACIFICA FOUNDATION and  
11 EVA GEORGIA

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES

12 MOLLY PAIGE,

13 Plaintiff,

14 v.

15 PACIFICA FOUNDATION, EVA GEORGIA  
16 and DOES 1 through .50, inclusive,

17 Defendants.

Case No. BC 365 777  
Assigned to Judge Mark Mooney  
Department 68

DEFENDANT PACIFICA  
FOUNDATION'S RESPONSE  
TO PLAINTIFF'S FORM  
INTERROGATORIES-EMPLOYMENT  
LAW, SET ONE

Case Filed: February 2, 2007  
Trial Date: June 16, 2008

21 PROPOUNDING PARTY: Plaintiff MOLLY PAIGE

22 RESPONDING PARTY: Defendant PACIFICA FOUNDATION

23 SET: One (1)

24  
25 Defendant PACIFICA FOUNDATION responds as follows to plaintiff MOLLY PAIGE'S  
26 Form Interrogatories-Employment Law, Set One. All responses to these interrogatories are subject  
27 to and incorporate by reference the following comments and/or objections:  
28



## GENERAL OBJECTIONS

1  
2 1. Defendant's discovery and investigation have proceeded with diligence but are,  
3 nevertheless, incomplete and continuing. Accordingly, the following responses reflect information  
4 presently in defendant's possession, and are as complete as defendant is required by law and able to  
5 give. The responses do not, however, reflect other information that may be obtained through on-  
6 going factual investigation, review, analysis, discovery, and trial preparation. Defendant reserves  
7 the right to use and/or introduce additional facts and/or information that may become available to  
8 defendant at a later date.

9 2. Defendant reserves all objections or other questions as to the competency, relevance,  
10 materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this or  
11 any other action for any purpose whatsoever of this response and any document or thing produced in  
12 response to the request.

13 3. Defendant objects to these form interrogatories to the extent that they call for  
14 information protected by the attorney-client privilege and/or work-product doctrine.

15 4. Defendant objects to all definitions, instructions and interrogatories in which the  
16 terms "constitute," "evidence," "support," "relate to," or "refer to" appear. These terms are overly  
17 broad, vague, ambiguous and unintelligible, require subjective judgment on the part of defendant and  
18 defendant's attorneys, and would require a conclusion or opinion of counsel in violation of the  
19 attorney work product doctrine.  
20

### RESPONSES TO FORM INTERROGATORIES – EMPLOYMENT LAW

#### RESPONSE TO FORM INTERROGATORY NO. 200.3:

21  
22  
23  
24 Yes.

- 25 (a) Documents reflect the employment relationship.  
26 (b) Pacifica's counsel; Eva Georgia.  
(c) Documents will be produced.

#### RESPONSE TO FORM INTERROGATORY NO. 200.4

27  
28 Yes.

- 1 (a) Documents will be produced.  
2 (b) Documents distributed to employees by management.  
3 (c) Unknown.

4 RESPONSE TO FORM INTERROGATORY NO. 200.5:

5 Yes.

- 6 (a) The document will be produced.  
7 (b) The document will be produced.  
8 (c) The document will be produced.

9 RESPONSE TO FORM INTERROGATORY NO. 200.6:

10 No.

11 RESPONSE TO FORM INTERROGATORY NO. 201.3:

12 No. Plaintiff suffered no adverse actions.

13 RESPONSE TO FORM INTERROGATORY NO. 201.4:

14 Not applicable.

15 RESPONSE TO FORM INTERROGATORY NO. 201.7:

16 Not applicable.

17 RESPONSE TO FORM INTERROGATORY NO. 207.1:

18 Yes.

- 19 (a) Documents will be produced.  
20 (b) Documents distributed to employees.  
21 (c) Unknown.  
22 (d) Not applicable.  
23 (e) Not applicable.

24 RESPONSE TO FORM INTERROGATORY NO. 207.2:

25 Yes.

- 26 (a) 2006;  
27 (b) Plaintiff's complaint tracked the allegations contained in her lawsuit;  
28 (c) Pacifica's human resource director, Yolanda Thomas, and executive director, Greg Guma;  
(d) Dan Siegel, Pacifica's counsel;  
(e) Dan Siegel, Pacifica's counsel, Greg Guma, Executive Director;  
(f) Documents will be produced;  
(g) Pacifica attempted to resolve plaintiff's complaint in conversations with her counsel;  
(h) Plaintiff was presumably advised of the employer's efforts by her counsel;  
(i) Documents will be produced;

1 (j) Eva Georgia; Pacifica counsel Dan Siegel; Pacifica Executive Director Greg Guma;  
members of the Pacifica National Board.

2 RESPONSE TO FORM INTERROGATORY NO. 208.1:

3 Yes.

- 4 (a) April 3, 2006; July 19 2006;  
5 (b) California Department of Fair Employment and Housing, 611 West Sixth Street, Suite  
1500, Los Angeles, CA 90017;  
6 (c) E200607S0085-00-rc; E200506D1475-00-rsc; E200506D1475-01-rsc; E200506D1475-  
02-rsc; E200506D1475-03-rsc; E200506D1475-04-rsc;  
7 (d) Charges tracked allegations of the complaint filed in this case;  
8 (e) April 2006; August 2006;  
9 (f) Not applicable;  
(g) Yes; April 14 and August 7, 2006;  
(h) No.

10  
11 RESPONSE TO FORM INTERROGATORY NO. 208.2:

12 Yes.

- 13 (a) The employer conducted an extensive investigation of the complaints by interviewing the  
14 employee; all persons identified by the employee as having knowledge relevant to her  
15 allegations; Eva Georgia; all persons identified by Georgia as having knowledge relevant  
16 to the employee's allegations; all persons who self-identified as having information  
17 relevant to the employee's allegations;  
(b) Dan Siegel, Pacifica counsel;  
(c) Dan Siegel, Greg Guma;  
(d) Documents containing this information will be produced.

18 RESPONSE TO FORM INTERROGATORY NO. 209.2:

19 Yes.

- 20 (a) Noelle Hanrahan, address and telephone number unknown;  
21 (b) Alameda County Superior Court No. RG05205198; Hanrahan, Pacifica Foundation,  
Dennis Bernstein;  
22 (c) Stewart & Musell, Wendy E. Musell, Elisa J. Stewart, 600 Harrison Street, Suite 120, San  
Francisco, CA 94107; (415) 593-0083;  
23 (d) The action has been resolved.

- 24 (a) Sheri Epstein, address and telephone number unknown;  
25 (b) Los Angeles County Superior Court No. BC374299, Sheri Epstein, Pacifica Foundation,  
Eva Georgia;  
26 (c) Toni J. Jaramilla, 10010 Santa Monica Boulevard, Suite 300, Los Angeles, CA 90067;  
(310) 551-3020.  
27 (d) The action is pending.

- 28 (a) Santiago Nieves, address and telephone number unknown;

- 1 (b) Supreme Court of the State of New York, County of New York, No. 118938/06; Santiago  
Nieves, Pacifica Foundation;  
2 (c) Brown, Rudnick, Berlack, Israels LLP, David E. Miller, Seven Times Square, New York,  
New York 10036; (212) 209-4800;  
3 (d) The action is pending.  
4 (a) Gary Null, address and telephone number unknown;  
5 (b) Supreme Court of the State of New York, County of New York, No. 118552/2006; Gary  
Null, WBAI-FM, Pacifica Foundation, Bernard White, Don Rojas and Unpaid Staff  
Organizing Committee aka USOC;  
6 (c) Marvin Small, 90-28 Sutphin Boulevard, Jamaica, New York 11435; (718) 297-2811;  
7 (d) The action is pending.

8 RESPONSE TO FORM INTERROGATORY NO. 211.1:

9 None. The plaintiff has suffered no loss of benefits.

10 RESPONSE TO FORM INTERROGATORY NO. 214.1:

11 Yes. See response to Form Interrogatories – General, No. 4.1.

12 RESPONSE TO FORM INTERROGATORY NO. 214.2:

13 No. See response to Form Interrogatories – General, No. 4.2.

14 RESPONSE TO FORM INTERROGATORY NO. 215.1:

15 Yes. See response to Form Interrogatories – General, No. 12.2.

16 RESPONSE TO FORM INTERROGATORY NO. 215.2:

17 Yes. See response to Form Interrogatories – General, No. 12.3.

18 RESPONSE TO FORM INTERROGATORY NO. 216.1:

19 Defendant denies the material allegations contained in the following paragraphs of the First  
20 Amended Complaint: 15-33, 36-39, 42-52, 55-58, 61-65, 68-71, 73-78, 80-83, 85-88, 90-96, 98-103,  
21 105-113, 115-120, 122-132, 134-139, 141-145.  
22

- 23 (a) Neither defendants nor their agents committed acts of sexual harassment, racial  
24 harassment, or retaliation against plaintiff Molly Paige. The “facts” upon which  
25 defendants base their denials are the absence of such conduct. Molly Paige has suffered  
26 no adverse action and remains employed in the same position with the same wages and  
27 benefits of employment she enjoyed prior to complaining about her treatment. Neither  
28

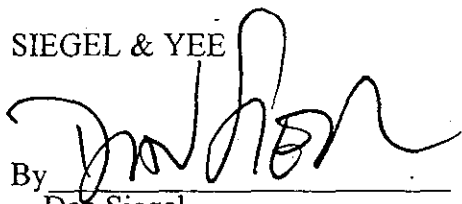
1 defendants nor their agents are aware of any misconduct or misuse of resources as alleged  
2 in the ninth cause of action. As to the tenth claim for intentional infliction of emotional  
3 distress, that claim is barred by defendant Pacifica's compliance with the Workers  
4 Compensation Law. As to the thirteenth claim for Labor Code violations, defendants  
5 deny that they have barred plaintiff's access to her personnel files.

6 (b) Among the witnesses who can testify that there was no sexual or racial harassment or  
7 retaliation against the plaintiff are Molly Paige, Eva Georgia, Armando Guidino,  
8 Fernando Velasquez, Patrick Burke, Aura Abogado, Jennifer Kiser, Bridgette Ramasodi,  
9 Maria Armoudian, Alan Minsky, Lydia Brazon, Sue Welch, Dan Fritz, Tony Bates,  
10 Maggie LaPique, Christine Blosdale. All of these persons may be contacted through  
11 defendants' counsel or located at KPFK, 3729 Cahuenga Boulevard West, North  
12 Hollywood, CA 91604; (818) 985-2711.

13  
14 (c) Relevant documents will be produced.

15  
16 Dated: August 17, 2007

17 SIEGEL & YEE

18  
19 By   
20 Dan Siegel

21 Attorneys for Defendants  
22 PACIFICA FOUNDATION and  
23 EVA GEORGIA  
24  
25  
26  
27  
28

VERIFICATION

I, GREG GUMA, declare as follows:

I am the Executive Director of the Pacifica Foundation, a defendant in the above-captioned matter. I am familiar with the contents of the foregoing Response to Plaintiff's Form Interrogatories, Employment Law. The information contained therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents and employees of the Foundation and is therefore provided as required by law. The information contained in the foregoing document is true, except as to those matters which were provided by my attorneys or other agents, and, as to those matters, I am informed and believe that it is true.

I declare under penalty of perjury that the foregoing is true and correct and that this verification was executed on August 17, 2007, at Berkeley, California.

  
\_\_\_\_\_  
Greg Guma

PROOF OF SERVICE

I, DAN SIEGEL, declare as follows:

I am an attorney duly licensed to practice law in the State of California. I am not a party to the within action. My business address is 499 14th Street, Suite 220, Oakland, CA 94612.

On August 17, 2007, I served copies of the following documents:

**1. DEFENDANT PACIFICA FOUNDATION'S RESPONSE TO  
PLAINTIFF'S FORM INTERROGATORIES, EMPLOYMENT  
LAW, SET ONE**

on the parties to this action by placing true copies thereof in sealed envelopes with first class postage thereon fully prepaid and depositing the same in the United States mail at Oakland, California, addressed to:

Philip J. Ganz, Jr.  
Laurie Susan Gorsline  
Ganz & Gorsline  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17, 2007, at Oakland, California.

---

Dan Siegel

1 DAN SIEGEL, SBN 056400  
2 SIEGEL & YEE  
3 499 14<sup>th</sup> Street, Suite 220  
4 Oakland, CA 94612  
5 Tel. (510) 839-1200  
6 Telefax. (510) 444-6698

7  
8 Attorneys for Defendants  
9 PACIFICA FOUNDATION and  
10 EVA GEORGIA  
11

12  
13 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14  
15 IN AND FOR THE COUNTY OF LOS ANGELES  
16

17 MOLLY PAIGE,

18 Plaintiff,

19 v.

20 PACIFICA FOUNDATION, EVA GEORGIA  
21 and DOES 1 through 50, inclusive,

22 Defendants.  
23

Case No. BC 365 777

Assigned to Judge Mark Mooney  
Department 68

DEFENDANT EVA GEORGIA'S  
RESPONSE TO PLAINTIFF'S  
FORM INTERROGATORIES-  
EMPLOYMENT LAW, SET ONE

Case Filed: February 2, 2007

Trial Date: June 16, 2008

24 PROPOUNDING PARTY: Plaintiff MOLLY PAIGE

25 RESPONDING PARTY: Defendant EVA GEORGIA

26 SET: One (1)

27 Defendant EVA GEORGIA responds as follows to plaintiff MOLLY PAIGE'S Form

28 Interrogatories-Employment Law, Set One. All responses to these interrogatories are subject to and  
incorporate by reference the following comments and/or objections:



1  
2 GENERAL OBJECTIONS

3 1. Defendant's discovery and investigation have proceeded with diligence but are,  
4 nevertheless, incomplete and continuing. Accordingly, the following responses reflect information  
5 presently in defendant's possession, and are as complete as defendant is required by law and able to  
6 give. The responses do not, however, reflect other information that may be obtained through on-  
7 going factual investigation, review, analysis, discovery, and trial preparation. Defendant reserves  
8 the right to use and/or introduce additional facts and/or information that may become available to her  
9 at a later date.

10 2. Defendant reserves all objections or other questions as to the competency, relevance,  
11 materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this or  
12 any other action for any purpose whatsoever of this response and any document or thing produced in  
13 response to the request.  
14

15 3. Defendant objects to these form interrogatories to the extent that they call for  
16 information protected by the attorney-client privilege and/or work-product doctrine.

17 4. Defendant objects to all definitions, instructions and interrogatories in which the  
18 terms "constitute," "evidence," "support," "relate to," or "refer to" appear. These terms are overly  
19 broad, vague, ambiguous and unintelligible, require subjective judgment on the part of defendant and  
20 defendant's attorneys, and would require a conclusion or opinion of counsel in violation of the  
21 attorney work product doctrine.  
22

23 RESPONSES TO FORM INTERROGATORIES

24 GENERAL OBJECTIONS

25 1. Defendant's discovery and investigation have proceeded with diligence but are,  
26 nevertheless, incomplete and continuing. Accordingly, the following responses reflect information  
27 presently in defendant's possession, and are as complete as defendant is required by law and able to  
28 give. The responses do not, however, reflect other information that may be obtained through on-

1 going factual investigation, review, analysis, discovery, and trial preparation. Defendant reserves  
2 the right to use and/or introduce additional facts and/or information that may become available to  
3 defendant at a later date.

4 2. Defendant reserves all objections or other questions as to the competency, relevance,  
5 materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this or  
6 any other action for any purpose whatsoever of this response and any document or thing produced in  
7 response to the request.

8 3. Defendant objects to these form interrogatories to the extent that they call for  
9 information protected by the attorney-client privilege and/or work-product doctrine.

10 5. Defendant objects to all definitions, instructions and interrogatories in which the  
11 terms "constitute," "evidence," "support," "relate to," or "refer to" appear. These terms are overly  
12 broad, vague, ambiguous and unintelligible, require subjective judgment on the part of defendant and  
13 defendant's attorneys, and would require a conclusion or opinion of counsel in violation of the  
14 attorney work product doctrine.  
15

16 RESPONSES TO FORM INTERROGATORIES – EMPLOYMENT LAW

17 RESPONSE TO FORM INTERROGATORY NO. 200.3:

18 Yes.

- 19 (a) Documents reflecting the employment relationship will be produced.  
20 (b) Pacifica's counsel; and Eva Georgia.  
21 (c) Documents will be produced.

22 RESPONSE TO FORM INTERROGATORY NO. 200.4

23 Yes.

- 24 (a) Documents will be produced.  
25 (b) Documents distributed to employees by management.  
26 (c) Unknown.

27 RESPONSE TO FORM INTERROGATORY NO. 200.5:

28 No.

1 RESPONSE TO FORM INTERROGATORY NO. 200.6:

2 No.

3 RESPONSE TO FORM INTERROGATORY NO. 201.3:

4 No. Plaintiff suffered no adverse actions.

5 RESPONSE TO FORM INTERROGATORY NO. 201.4:

6 Not applicable.

7 RESPONSE TO FORM INTERROGATORY NO. 201.7:

8 Not applicable.

9 RESPONSE TO FORM INTERROGATORY NO. 207.1:

10 Yes.

- 11 (a) Documents will be produced.  
12 (b) Documents distributed to employees.  
13 (c) Unknown.  
14 (d) Not applicable.  
15 (e) Not applicable.

16 RESPONSE TO FORM INTERROGATORY NO. 207.2:

17 Yes.

- 18 (a) 2006;  
19 (b) Plaintiff's complaint tracked the allegations contained in her lawsuit;  
20 (c) Pacifica's Human Resource Director, Yolanda Thomas, and Executive Director, Greg  
21 Guma;  
22 (d) Dan Siegel, Pacifica's counsel;  
23 (e) Dan Siegel, Pacifica's counsel;  
24 (f) Documents will be produced;  
25 (g) Pacifica attempted to resolve plaintiff's complaint in conversations with her counsel;  
26 (h) Plaintiff was presumably advised of the employer's efforts by her counsel;  
27 (i) Documents will be produced;  
28 (j) Eva Georgia; Pacifica counsel Dan Siegel; Pacifica Executive Director Greg Guma;  
Pacifica Human Resources Director, Yolanda Thomas; members of the Pacifica National Board.

24 RESPONSE TO FORM INTERROGATORY NO. 208.1:

25 Yes.

- 26 (a) April 3, 2006; July 19 2006;  
27 (b) California Department of Fair Employment and Housing, 611 West Sixth Street, Suite  
28 1500, Los Angeles, CA 90017;  
(c) E200607S0085-00-rc; E200506D1475-00-rsc; E200506D1475-01-rsc; E200506D1475-

- (d) Charges tracked allegations of the complaint filed in this case;
- (e) April 2006; August 2006;
- (f) Not applicable;
- (g) Yes; April 14 and August 7, 2006;
- (h) No.

RESPONSE TO FORM INTERROGATORY NO. 208.2:

Yes.

- (a) In May 2006, the employer conducted an extensive investigation of the complaints by interviewing the employee; all persons identified by the employee as having knowledge relevant to her allegations; Eva Georgia; all persons identified by Georgia as having knowledge relevant to the employee's allegations; all persons who self-identified as having information relevant to the employee's allegations;
- (b) Dan Siegel, Pacifica counsel;
- (c) Dan Siegel, Greg Guma;
- (d) Documents containing this information will be produced.

RESPONSE TO FORM INTERROGATORY NO. 209.2:

Yes.

- (a) Noelle Hanrahan, address and telephone number unknown;
  - (b) Alameda County Superior Court No. RG05205198; Hanrahan, Pacifica Foundation, Dennis Bernstein;
  - (c) Stewart & Musell, Wendy E. Musell, Elisa J. Stewart, 600 Harrison Street, Suite 120, San Francisco, CA 94107; (415) 593-0083;
  - (d) The action has been resolved.
- 
- (a) Sheri Epstein, address and telephone number unknown;
  - (b) Los Angeles County Superior Court No. BC374299, Sheri Epstein, Pacifica Foundation, Eva Georgia;
  - (c) Toni J. Jaramilla, 10010 Santa Monica Boulevard, Suite 300, Los Angeles, CA 90067; (310) 551-3020.
  - (d) The action is pending.
- 
- (a) Santiago Nieves, address and telephone number unknown;
  - (b) Supreme Court of the State of New York, County of New York, No. 118938/06; Santiago Nieves, Pacifica Foundation;
  - (c) Brown, Rudnick, Berlack, Israels LLP, David E. Miller, Seven Times Square, New York, New York 10036; (212) 209-4800;
  - (d) The action is pending.
- 
- (a) Gary Null, address and telephone number unknown;
  - (b) Supreme Court of the State of New York, County of New York, No. 118552/2006; Gary Null, WBAI-FM, Pacifica Foundation, Bernard White, Don Rojas and Unpaid Staff Organizing Committee aka USOC;
  - (c) Marvin Small, 90-28 Sutphin Boulevard, Jamaica, New York 11435; (718) 297-2811;
  - (d) The action is pending.

1 RESPONSE TO FORM INTERROGATORY NO. 211.1:

2 None. The plaintiff has suffered no loss of benefits.

3 RESPONSE TO FORM INTERROGATORY NO. 214.1:

4 Yes. See response to Form Interrogatories – General, No. 4.1.

5 RESPONSE TO FORM INTERROGATORY NO. 214.2:

6 No. See response to Form Interrogatories – General, No. 4.2.

7 RESPONSE TO FORM INTERROGATORY NO. 215.1:

8 Yes. See response to Form Interrogatories – General, No. 12.2.

9 RESPONSE TO FORM INTERROGATORY NO. 215.2:

10 Yes. See response to Form Interrogatories – General, No. 12.3.

11 RESPONSE TO FORM INTERROGATORY NO. 216.1:

12 Defendant denies the material allegations contained in the following paragraphs of the First  
13 Amended Complaint: 15-33, 36-39, 42-52, 55-58, 61-65, 68-71, 73-78, 80-83, 85-88, 90-96, 98-103,  
14 105-113, 115-120, 122-132, 134-139, 141-145.

15 (a) Neither defendants nor their agents committed acts of sexual harassment, racial  
16 harassment, or retaliation against plaintiff Molly Paige. The “facts” upon which  
17 defendants base their denials are the absence of such conduct. Molly Paige has suffered  
18 no adverse action and remains employed in the same position with the same wages and  
19 benefits of employment she enjoyed prior to complaining about her treatment. Neither  
20 defendants nor their agents are aware of any misconduct or misuse of resources as alleged  
21 in the ninth cause of action. As to the tenth claim for intentional infliction of emotional  
22 distress, that claim is barred by defendant Pacifica’s compliance with the Workers  
23 Compensation Law. As to the thirteenth claim for Labor Code violations, defendants  
24 deny that they have barred plaintiff’s access to her personnel files.

25 (b) Among the witnesses who can testify that there was no sexual or racial harassment or  
26  
27  
28

1 retaliation against the plaintiff are Molly Paige, Eva Georgia, Armando Guidino,  
2 Fernando Velasquez, Patrick Burke, Aura Abogado, Jennifer Kiser, Bridgette Ramasodi,  
3 Maria Armoudian, Alan Minsky, Lydia Brazon, Sue Welch, Dan Fritz, Tony Bates,  
4 Maggie LaPique, Christine Blodale. All of these persons may be contacted through  
5 defendants' counsel or located at KPFK, 3729 Cahuenga Boulevard West, North  
6 Hollywood, CA 91604; (818) 985-2711.

7 (c) Relevant documents will be produced.

8  
9 Dated: August 10, 2007

10 SIEGEL & YEE

11 By   
12 Dan Siegel

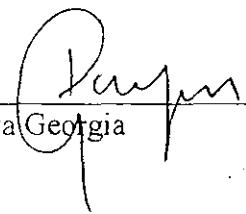
13 Attorneys for Defendants  
14 PACIFICA FOUNDATION and  
15 EVA GEORGIA  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

VERIFICATION

I, EVA GEORGIA, declare as follows:

I am a defendant in the above-captioned matter. I have read and am familiar with the contents of the foregoing Response to Plaintiff's Form Interrogatories, Employment Law. The information contained therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents and employees of the Pacifica Foundation and is therefore provided as required by law. The information contained in the foregoing document is true, except as to those matters which were provided by my attorneys or other agents of the Pacifica Foundation, and, as to those matters, I am informed and believe that it is true.

I declare under penalty of perjury that the foregoing is true and correct and that this verification was executed on August 10, 2007, at Los Angeles, California.

  
\_\_\_\_\_  
Eva Georgia

PROOF OF SERVICE

I, DAN SIEGEL, declare as follows:

I am an attorney duly licensed to practice law in the State of California. I am not a party to the within action. My business address is 499 14th Street, Suite 220, Oakland, CA 94612.

On August 13, 2007, I served copies of the following documents:

**1. DEFENDANT EVA GEORGIA'S RESPONSES TO PLAINTIFF'S  
FORM INTERROGATORIES, EMPLOYMENT LAW**

on the parties to this action by placing true copies thereof in sealed envelopes with first class postage thereon fully prepaid and depositing the same in the United States mail at Oakland, California, addressed to:

Philip J. Ganz, Jr.  
Laurie Susan Gorsline  
Ganz & Gorsline  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 13, 2007, at Oakland, California.

---

Dan Siegel

7-10-07



11620 Wilshire Boulevard, Suite 340  
Los Angeles, California 90025-1769  
E Mail: info@ganzgorslaw.com  
Website: www.ganzgorslaw.com  
Telephone: (310) 235-1700  
Facsimile: (310) 235-1707

**GANZ & GORSLINE** A LAW PARTNERSHIP

---

Philip J. Ganz, Jr.\*  
Laurie Susan Gorsline  
\*A Professional Corporation

September 6, 2007

**Via Facsimile and U.S. Mail**

Daniel Siegel, Esq.  
Siegel & Yee  
499 14th Street, Suite 220  
Oakland, CA 94612

Re: Molly Paige v. Pacifica Foundation, Eva Georgia, et al.

Dear Mr. Siegel:

We have written you several letters detailing some of the problems with your clients' discovery responses which have still not been corrected or properly addressed. In fact, we have been trying to get you to provide proper and complete responses and all of the responsive documents since May – for the last 4 months – and have yet to receive it. This is our final request.

**Requests for Production Nos. 1-63**

Among other things, we still do not have proper verifications nor have you produced all of the responsive documents some of which were described in our previous letter to you. Nor have you complied with C.C.P. §2031.280 by advising us in writing by Bates label number as to which documents produced correspond to the categories in the demand so as to indicate to which request they respond.

As we previously told you, the obligation to have diligently searched for and found the documents exists with when the responses were served not at some indefinite time into

Siegel Ltr. 20.wpd

EXHIBIT

8 ✓

the future. As such, providing a response that documents would be served for later is hardly adequate, yet that is exactly what Defendants state by way of their preliminary comments. Furthermore, as we previously told you, Defendants have also failed to comply with CCP§ 2031.230 by failing to state under oath why they cannot produce all of the requested documents and why they cannot produce them.

Furthermore, Defendants waived all of their objections, yet they have persisted including in their responses numerous and repeated objections which they have incorporated into all of the requests in their "General Objections." This is improper.

Regarding Request No. 1, despite the claim that they have provided all documents, Defendants have not produced all of the documents requested. Where are all of the complaints filed against Pacifica, including those filed by Ms. Orozco, Andrea Clarke, Noelle Hanrahan, Esther Manilla, Maria Armoudian and those women who made complaints against Roy Campenella II, and those complaints made against Fernando Velasquez and/or Armando Guidino? Where are Yolanda Thomas notes of her interviews with Andrea Clarke and Maria Armoundian. They have not been produced.

Regarding No. 2, where are all of the documents regarding the investigations of those claims? They have not been produced and any the statement Defendants "will" produce them at some later time is not sufficient.

Regarding No. 3, where are all of the documents regarding the discipline imposed regarding those claims? They have not been produced and any the statement Defendants "will" produced them at some later time is not sufficient. The documents are overdue.

Regarding No. 4, despite the claim that they have provided all documents, Defendants have not produced all of the documents requested. Where are all of the complaints filed against Eva Georgia at any time, including those regarding sexual harassment, sexual discrimination, racial harassment, racial discrimination, assault, battery, embezzlement, financial improprieties, misuse of company property, misappropriation of company property, misuse of company personnel, and/or retaliation, including but not limited to, those complaints made and/or reported by Esther Manilla,

Daniel Siegel, Esq.  
September 6, 2007  
Page 3

Maria Armoudian, Bridgit Ramasodi, Sheri Epstein, Ms J. Isaacs, Maria Gilardin, Pat Crosby, Diana Barahona, and Molly Paige? The documents are overdue.

Regarding No. 5, where are all of the documents pertaining to the investigations done regarding Eva Georgia at any time with respect to any complaint made against her at any time, including those made about her with regard to sexual harassment, sexual discrimination, racial harassment, racial discrimination, assault, battery, embezzlement, financial improprieties, misuse of company property, misuse of company personnel, misappropriation of company property and/or retaliation, including but not limited to, those complaints made and/or reported by Esther Manilla, Maria Armoudian, Bridgit Ramasodi, Sheri Epstein, Ms J. Isaacs, Maria Gilardin, Pat Crosby, Diana Barahona, and Molly Paige? Defendants claim that they are aware of no impropriety, where are the document regarding same. They have not been produced.

Regarding No. 6, where are the documents regarding discipline imposed against Eva Georgia with regard to any complaint of sexual harassment, sexual discrimination, racial harassment, racial discrimination, assault, battery and/or retaliation within the last 10 years, including but not limited to those complaints made and/or reported by Esther Manilla, Maria Armoudian, Bridgit Ramasodi, Sheri Epstein, Ms J. Isaacs, Maria Gilardin, Pat Crosby, Diana Barahona, and Molly Paige? They have not been produced.

Regarding No. 7, Defendants have failed to produce all of the Plaintiff's complaints.

Regarding No. 8, Defendants have failed to produce all of the documents regarding investigations of those complaints.

Regarding No. 9, Defendants have failed to produce all of the documents regarding interviews regarding any complaints made by PLAINTIFF, including notes or memos of any interviews with any of the Defendants or any employee of any Defendant.

Regarding No. 10, Defendants have failed to comply with CCP 2031.230 as we have repeatedly advised you. We expect Defendants to state why they cannot comply.

Daniel Siegel, Esq.  
September 6, 2007  
Page 4

Regarding Nos. 11 and 12, Defendants have not produced all of the documents since we don't see any of the documents which were presented to the Board, nor do we see any of the emails between Dan Siegel and Defendants with regard to setting up the interviews, in conducting the interviews and what was reported back to the Board and Guma with regard to those interviews. We know that your office and Defendants have sent emails and issued other writings with regard to the Lawsuit yet we don't see those communications. These documents must be produced as all privileges have been waived.

Regarding Nos. 13 and 14, again, Defendants have failed to comply with CCP 2031.230 as we have repeatedly advised you. We expect Defendants to state why they cannot comply.

Regarding Nos. 17-22, complete copies of these documents do not appear to have been produced. This is complicated by the fact that Defendants have not complied with C.C.P. §2031.280 by advising us in writing by bates label number as to which documents produced correspond to the categories in the demand so as to indicate to which request they respond. Where are the file jackets which were requested? We do not see them.

Regarding Nos. 23, we also do not see all of Molly Paige's payroll records, including her vacation records. They have not been produced. We request that they are produced forthwith.

Regarding Nos. 24-31 and 33-35 and 45, Defendants have failed to produce all of the requested documents. This is complicated by the fact that Defendants have not complied with C.C.P. §2031.280 by advising us in writing by bates label number as to which documents produced correspond to the categories in the demand so as to indicate to which request they respond.

Regarding Nos. 32 and 46, Defendants have failed to comply with CCP 2031.230 as we have repeatedly advised you. We expect Defendants to state why they cannot comply.

Regarding Nos. 36- 43, Defendants have not produced these documents. These requests contain an obvious typo. The year is supposed to state 2006 rather than 2007. In

Daniel Siegel, Esq.  
September 6, 2007  
Page 5

any event, we told you in our prior letter that these documents were missing and we still do not have them. We want each and every email about the Plaintiff after April 27, 2006, including the "X factor memo" and all documents which responded thereto. These have not been produced and all objections were waived. We know that the documents were generated and we will ask that the Court sanction the Defendants for each and every document which is not produced.

Regarding Nos. 44, Defendants have failed to comply with CCP 2031.230 as we have repeatedly advised you. We expect Defendants to state why they cannot comply. We know that this document exists because it has been seen. We want to know why it has not been produced or located. We will ask that the Court sanction the Defendants if it is not produced.

Regarding Nos. 47-52, Defendants have failed to produce all of the requested documents. This is complicated by the fact that Defendants have not complied with C.C.P. §2031.280 by advising us in writing by bates label number as to which documents produced correspond to the categories in the demand so as to indicate to which request they respond.

Regarding No. 53, we know that there are documents which pertain to the destruction of emails at Pacifica. Yet, Defendants continue to claim that it is not happening. We know that when complaints were made about this by Molly Paige through my office that emails and other reports and correspondence were generated. Yet, none of these emails or other documents have been produced. Where are they?

Regarding No. 54, we know that there are documents which pertain to the retention of electronic media at Pacifica. Yet, Defendants continue to claim there are no documents. As you may recall, you told me when Molly Paige made her complaints that efforts were made to restore the data. Yet, none of these emails or other documents have been produced. Where are they?

Regarding No. 55-56, Defendants have failed to produce all of the requested documents. This is complicated by the fact that Defendants have not complied with C.C.P. §2031.280 by advising us in writing by bates label number as to which documents

produced correspond to the categories in the demand so as to indicate to which request they respond.

Regarding No. 57, Defendants have failed to comply with CCP 2031.230 as we have repeatedly advised you. We expect Defendants to state why they cannot comply. We know that this document exists because it has been seen. We want to know why it has not been produced or located. We will ask that the Court sanction the Defendants if it is not produced.

Regarding Nos. 58-63, Defendants have failed to produce all of the requested documents. This is complicated by the fact that Defendants have not complied with C.C.P. §2031.280 by advising us in writing by bates label number as to which documents produced correspond to the categories in the demand so as to indicate to which request they respond.

#### **Form Interrogatories - Nos. 1-6 - Georgia**

The same problems infect these responses. Objections have been lodged even though they were waived. This is completely improper. Furthermore, Georgia has not properly answered the following questions: No. 2.5 (b) and (c) [does not list her prior addresses and dates she has lived at the addresses], No. 2.6 as she has not answered all subparts, No. 4.1 as subparts have not been answered but only reference other documents which is completely improper,<sup>1</sup> No. 12.1 as all subparts have not been answered and an evasive response has been given, No. 12.2 in that all Defendant has done is refer to documents but has made no effort to answer the questions. This is improper. See fn. 1. We have a right to know in a statement under oath as to whether statements or interviews were done, when they were done, who did them without fishing through a bunch of handwritten notes that are not even legible; furthermore, there may be interviews conducted which did not result in any statement; No. 12.6 is non-responsive and evasive as the subparts have not been answered; Nos. 16.1, 16.2 are both non-responsive. Again, to

---

<sup>1</sup> See, Weil & Brown, CAL. PRAC. GUIDE: CIV. PRO. BEFORE TRIAL §9:1049 (TRG 2007)(It is not proper to answer by merely referring to documents. "If the question requires reference to some other documents, it should be identified and its contents summarized so that the answer *by itself* is fully responsive to the interrogatory.")

Siegel Ltr. 20.wpd

state that the "incident" did not occur is completely evasive and untrue. There are emails which show the "incidents" did occur. If Defendants contend that the "incident" did not occur as the basis for its answer to nos. 16.1 and 16.2 we demand to know the facts, witnesses and documents upon which that is based.

As to No. 15.1, the answer given is totally inadequate. Certainly, the question requires that the Defendants provide a basis for their own defenses which Defendant has not done. In fact, all Defendants have done is to say the harassment did not occur. Yet, Defendants fail to state the facts defense of their case other than this bare and hollow conclusion. In response to the question, Defendant has not properly responded, but instead has given a non-responsive deftly-worded conclusion without providing any supporting facts. See, Weil & Brown, CAL. PRAC. GUIDE: CIV. PRO. BEFORE TRIAL, §8:1048 (TRG 2007) ["Nor may a party, by deftly-worded conclusory answers, evade a series of explicit questions."] Furthermore, Defendants seem to limit her response to only the harassment claims. The question clearly asks Defendants to provide all facts regarding their denials and affirmative defenses to any of the allegations in the Complaint -- it is not limited to the sexual and racial harassment claim, but covers the retaliation claim, the negligence claim, the public policy claims, as well as the other claims made by the Plaintiff. Defendant has failed to address any of these claims.

Clearly, Defendant's response is evasive and improper. Defendant most certainly knows the basis for her denials and affirmative defenses and she is required to state all facts (rather than just conclusions) upon which she bases them. Indeed, instead of just saying it did not happen, Defendants must state why they claim it did not happen. What facts are they going to use to prove it did not happen?

Defendant has also failed to provide any proper response to the sub-parts. Indeed, Defendant limits its response in subpart b to the harassment claims and has failed to provide any home addresses and telephone numbers. Defendant has failed to state list any of the documents upon which it is relying but cites to the documents produced in discovery. This is improper. (See, fn. 1.) We are entitled to know of the documents produced Defendants intend to rely.

In short, Defendant is required to state all facts in her written discovery responses upon which she bases the denials of and affirmative defenses to Plaintiff's claims and

respond to each of the sub-parts in Interrogatory 15.1. Defendant is required to answer this interrogatory completely and to chronicle her knowledge. Furthermore, Plaintiff is entitled to a full and complete response to all sub-parts, including the addresses and telephone numbers of any and all alleged witnesses and any documents upon which the Defendant relies.

#### **Form Interrogatories - Nos. 1-6 -Pacifica**

The same problems infect these responses. Objections have been made even though they were waived. This is completely improper. Furthermore, Defendant has not properly answered the following questions: No. 1.1 does not list who at the company was compiling the information. Since a corporation can only act through individuals, we request to know who at the company helped with the preparation of these responses. Since you are merely the attorney for the company and would have no knowledge of the information requested, we request to know from which persons the requested information was gathered. Also, Nos. 4.1, 12.1, 12.2, 12.6, 15.1, 16.1 and 16.2 are all nonresponsive for the same reasons as those stated above with regard to Georgia. In addition, how is it that the Defendants can claim that Plaintiff was provided with the documents which she requested under Labor Codes 1198, 226 and 1174? You know that these documents were never provided within 21 days. This was a violation of the law.

#### **Employment Form Interrogatories-- All Defendants**

The same problems infect these responses. Objections have been made even though they were waived. This is completely improper. Furthermore, Defendants have not properly answered the following questions: No. 200.3 Defendants have failed to properly respond to the subparts. The answer given to subpart (a) is completely non-responsive as is subpart (b) as to what is meant by "Pacifica's counsel" since no name has been given. Further, subpart (c) is also improper since all it says is that the documents will be produced. This is improper. See fn. 1.

Defendants have failed to answer the subparts in question 200.4. Saying "unknown" is simply not sufficient. Interrogatories directed toward a corporation require it to disclose information known not just by it but to all persons under its employ:



"While a corporation...may select the person who answers interrogatories in its behalf, it has a corresponding duty to obtain information from all sources under its control – information which may not be personally known to the answering agent." Weil & Brown, CAL. PRAC. GUIDE BEFORE TRIAL, Section 8:1056, citing Gordon v. Sup. Ct., 161 Cal. App. 3d 157, 167-168 (1984). (Emphasis added.)

Further, 200.5 is not proper either since all Defendant has done is refer to documents without identifying them or summarizing them. This is improper. See, fn. 1. In addition, Defendants have given no proper response to no. 201.3 but instead just says none of the events happened. Defendants know full well that Plaintiff's newscast was cut, yet it denies it occurred? Even Eva admits this occurred. It is clear that this is a blatantly false response which has been given in order to avoid answering the question. This is improper. Weil & Brown, CAL. PRAC. GUIDE BEFORE TRIAL, Section 8:1047. Interrogatory No. 201.4 has not been answered except to state "inapplicable." It most certainly is applicable and must be answered. The same is true of No. 201.7. The response given to No. 207.1 is also evasive and incomplete for the same reasons as 200.4 since all Defendant has done is refer to documents without identifying them or summarizing them and claims that some of the information is unknown. Also, the answer to No. 207.2 is completely inadequate. Defendant has again merely referred to documents without identifying them or summarizing them which is improper (see, fn. 1) and has failed to list whom was interviewed and has given only deftly worded answers without any real effort to answer the questions completely by giving the whole truth. Id. In No. 208.1 Defendants have failed to give the exact dates of notice to the employer. We want to know the answer to this question as it is relevant to the retaliation claim. And with regard to No. 208.2 Defendant has again improperly referred to unidentified documents. (See, fn. 1)

With regard to Nos. 214.1, 214.2, 215.1, 215.2, they improperly reference other interrogatories. Weil & Brown, CAL. PRAC. GUIDE BEFORE TRIAL, Section 8:1049-50. Also, these answers are defective for the same reasons as the answers to which they refer. Finally, with regard to interrogatory no. 216.1, this is defective for the same reasons as no. 15.1 to the form interrogatories.

9 Once again, we demand that all documents and proper and complete responses be provided forthwith. Our patience has run out. This is our final request. If we do not

Daniel Siegel, Esq.  
September 6, 2007  
Page 10

receive this information in our office by 11 a.m. on September 17, 2007 we will have no choice but to request that the Court take appropriate action against you and your clients.

Very truly yours,



LAURIE SUSAN GORSLINE

LSG/

10/3/07

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

September 6, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

**PAGE TOTAL:** 11

**MESSAGE:** SEE ATTACHED

**CONFIDENTIAL TRANSMISSION**

The information contained in this facsimile message is legally privileged and confidential information which is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please notify us by telephone and return the original message to us via U.S. Mail to the address listed above. Thank you.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO	3591
CONNECTION TEL	915104446698
CONNECTION ID	
ST. TIME	09/06 21:53
USAGE T	03'41
PGS. SENT	11
RESULT	OK

*Left a message on Mr. Siegel's voice mail.*

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
*telephone 310 235-1700 facsimile 310 235-1707*

**FACSIMILE COVER LETTER**

September 6, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Secretary to Philip J. Ganz, Jr., Esq. and  
Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

**PAGE TOTAL:** 11

**MESSAGE:** SEE ATTACHED



ATTORNEYS AT LAW

♦ DAN SIEGEL  
♦ ALAN S. YEE  
♦ JANE BRUNNER  
♦ JOSE LUIS  
FUENTES  
♦ TANYA RUSSELL  
♦ DEAN ROYER  
OF COUNSEL  
♦ ANNE  
BUTTERFIELD  
WEILLS

COPIES TO: ☒ Client  
☒ Phil  
☐ JRR  
☐ LSG

September 13, 2007

Philip J. Ganz, Jr.  
Ganz & Gorsline, ALP  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025

Re: Paige v. Pacifica Foundation, Eva Georgia  
Los Angeles County Superior Court No. BC365777

Dear Mr. Ganz:

I am writing in response to your firm's letter of September 6 as well as to raise other issues relevant to this case. I also want to advise you that I will be out of the country from September 15 through September 27 and request that you do not take actions that will require my engagement during that period.

If you wish to resume Eva Georgia's deposition, we should attempt to agree on a date soon, as she will be leaving the country for an extended trip on November 10. I have another trial coming up in Fresno on October 1, but will be available on the following dates, at a minimum: October 12 and 19, November 9.

In response to your letter of September 6, I would like to point out that the discovery laws require parties to "meet and confer." I do not believe that posturing, threatening, and attempting to set unilateral deadlines for our actions meets that requirement. Nonetheless, I will do my best to provide a reasonable response to the letter.

You claim that C.C.P. §2031.280 requires that our response to the document request include a designation that indicates which documents correspond to which request. Instead, the statute states that documents "shall either be produced as they are kept in the usual course of business, or be organized and labeled to correspond with the categories in the demand." We have chosen the former alternative. If you would like to come to my office to view the original documents, you will see that they have been produced just as they were organized by Pacifica.

Your letter makes a number of accusations to the effect that we are hiding documents. That is not true. Because you or your client believes that a document exists does not mean that it does exist. Further, as I have stated under oath in my response to your discovery motion, "Defendants did not withhold any documents or

information on the basis of any objection or claim of privilege. Instead, defendants provided all information and documentation that they were able to locate and produced those documents and information in good faith." Your letter lists documents and categories of documents that you allege we withheld. However, we actually produced many of the documents you claim are missing, such as Andrea Clarke's complaint. It may be useful to have a face to face meeting to discuss in a more precise way the documents you believe to exist and to be missing from our production.

In order to satisfy your concerns about the form of our response, I have prepared and am enclosing an amended response to the request for production.

I do not believe that your objections to our interrogatory responses are correct. In many cases, the objections seem overly technical. For example, Georgia's response to 2.5 makes it clear that she has lived at the address indicated for the past five years. Her answer to 2.6 omits her job title - it was "general manager." The answer to 4.1 is appropriate under C.C.P. § 2030.230, and we have produced the document. Are you really claiming that the answers to this interrogatory are not as readily available to you as they are to us, given that you now have the insurance policy?

I do not understand your objections to Georgia's answer to 12.1. How can we name a witness to an event that did not occur? Your client claims that certain events occurred, and my clients dispute her assertions. As to 12.2, we have produced all of the documents we have documenting our witness interviews. We have no further information regarding those interviews other than what is included on the statements and the interrogatory answer. The same is true with respect to 12.6. What information do you believe was withheld? Likewise, as it is our position that your client suffered no harassment and no retaliation, how do you expect us to provide information regarding the injuries she may claim to have suffered as requested in 16.1 and 16.2? As to 15.1, we have provided you with the information required. You may dispute the factual accuracy of our responses, but they represent the truth as we understand it. We have identified the witnesses who support our position and have produced the documents.

As to Pacifica's responses to the form interrogatories, our responses to your objections are the same as the responses to the objections to Georgia's responses. The exception concerns the response to 1.1, where we think that we have properly indicated who prepared the responses. Although not required, I am happy to advise you of the names of the Pacifica employees who helped gather the information we


10/10/07

used: Greg Guma, Yvonne Thomas, Lonnie Hicks, and Dominga Estrada (National Office); Eva Georgia, Sheri Epstein, and Sue Welch (KPFFK).

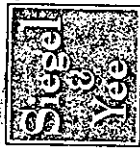
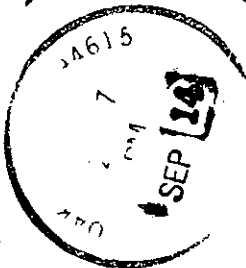
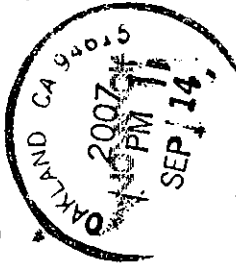
As to your concerns about the employment form interrogatories, I am sure that you understand that I am Pacifica's counsel as indicated in our response to 200.3. You can be confident that where we have indicated that the answer to a question is "unknown," we have conducted thorough inquiries and cannot answer the question.

The remainder of the objections you have made are answered by reference to what has been stated above. We reiterate that nothing has been withheld due to privilege. We have properly provided documents that contain the answers to the interrogatories where such is the case.

I am not interested in pursuing endless arguments that ultimately relate to the form or format of discovery responses. Our approach here has been to treat this matter in a completely transparent way and have opened our files to you. I am willing to engage in a face to face conversation about these matters in an effort to further explain our answers, to relate the documents that we have produced to specific interrogatories, and to identify specific areas where you believe that we have additional information that has not been produced.

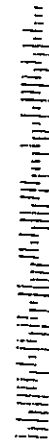
Very truly yours,  
  
DAN SIEGEL

first class



CITY SQUARE  
499 14TH STREET  
SUITE 220  
OAKLAND, CA  
ATTORNEYS AT LAW 94612

TO: Philip J. Ganz, Jr.  
Laurie Susan Gorsline  
Ganz & Gorsline  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769





11620 Wilshire Boulevard, Suite 340  
Los Angeles, California 90025-1769  
E Mail: info@ganzgorslaw.com  
Website: www.ganzgorslaw.com  
Telephone: (310) 235-1700  
Facsimile: (310) 235-1707

**GANZ & GORSLINE** A LAW PARTNERSHIP

Philip J. Ganz, Jr.\*  
Laurie Susan Gorsline  
\*A Professional Corporation

September 26, 2007

Via Facsimile and U.S. Mail

Daniel Siegel, Esq.  
Siegel & Yee  
499 14th Street, Suite 220  
Oakland, CA 94612

Re: Molly Paige v. Pacifica Foundation, Eva Georgia, et al.

Dear Mr. Siegel:

We understand from your voicemail that you are out of the Country until September 27, 2007. By this letter and a prior telephone conversation with your secretary, Liz Johnson, Mr. Ganz and Ms. Gorsline are currently in trial and as such, we are requesting an extension from September 29 to October 15, 2007, in which to file any Motions to Compel regarding Defendants' responses to Plaintiff's Employment Form Interrogatories (Set 1 individually propounded to Pacifica and Eva Georgia); Form Interrogatories propounded to Eva Georgia (Sets 1-5) and Form Interrogatories propounded to Pacifica (Sets 1-6), and to respond to your meet and confer letter in order to try to resolve this dispute. Please let me know at your earliest convenience if our request is granted.

Thank you in advance for your professional courtesy.

Very truly yours,

  
Rebecca Kounz  
Legal Secretary

3  
/rll

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

September 26, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Legal Secretary to  
Philip J. Ganz, Jr., Esq. and Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

**PAGE TOTAL:** 3

**MESSAGE:**

**CONFIDENTIAL TRANSMISSION**

Information contained in this facsimile message is legally privileged and confidential information which is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please notify us by telephone and return the original message to us via U.S. Mail to the address listed above. Thank you.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO	3646
CONNECTION TEL	915104446698
CONNECTION ID	
ST. TIME	09/26 15:34
USAGE T	00:53
PGS. SENT	3
RESULT	OK

*Chris confirmed the fax.*

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

September 26, 2007

TO: Daniel Siegel, Esq.  
Siegel & Yee

FACSIMILE: (510) 444-6698

TELEPHONE: (510) 839-1200

FROM: Rebecca Kounz, Legal Secretary to  
Philip J. Ganz, Jr., Esq. and Laurie Susan Gorsline, Esq.

SUBJECT: #5784 - Molly Paige v. Pacifica Foundation, etc. et al.

PAGE TOTAL: 3

MESSAGE:

11620 Wilshire Boulevard, Suite 340  
Los Angeles, California 90025-1769  
E Mail: info@ganzgorslaw.com  
Website: www.ganzgorslaw.com  
Telephone: (310) 235-1700  
Facsimile: (310) 235-1707

**GANZ & GORSLINE** A LAW PARTNERSHIP

---

Philip J. Ganz, Jr.\*  
Laurie Susan Gorsline  
•A Professional Corporation

September 30, 2007

Via Facsimile and U.S. Mail

Daniel Siegel, Esq.  
Siegel & Yee  
499 14th Street, Suite 220  
Oakland, CA 94612

Re: Molly Paige v. Pacifica Foundation, Eva Georgia, et al.

Dear Mr. Siegel:

As you are aware my partner and I are currently engaged in trial in Norwalk (and will probably be in trial until at least October 11). Because of my current unavailability to meet and confer with you during regular business hours, I had my secretary call you on September 20 to obtain an extension in which to file any Motions to Compel regarding Defendants' responses to Plaintiff's various discovery requests, and to possibly arrange an after hours conference call. However, when my secretary called, she was told that you were out of the Country and would not be available before September 28.

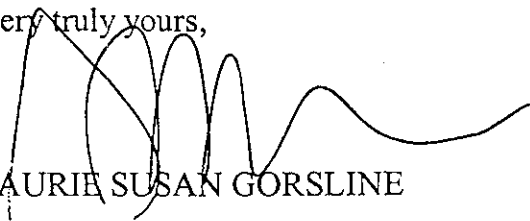
At that time, my secretary requested an extension to and including October 15 to file any motions to compel such that we could attempt to try to resolve the outstanding issues since you were not available to speak with me. After several days of following up with your office, on September 26, your secretary Liz called to inform us that, despite your being out of the County (and unavailable to meet and confer with me further) you had refused to grant us any extension whatsoever.

Your unwillingness to even attempt to work together to resolve our discover dispute leaves me no alternative but to proceed with filing further motions to compel. I must admit I am puzzled by your unwillingness to extend this deadline given that you have been out of

Daniel Siegel, Esq.  
September 30, 2007  
Page 2

the country until last Friday and not available to meet and confer with me and have not provided any supplemental responses to the interrogatories at issue.

Very truly yours,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

LAURIE SUSAN GORSLINE

LSG/rlk

10/4/07

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
telephone 310 235-1700 facsimile 310 235-1707

**FACSIMILE COVER LETTER**

September 30, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Legal Secretary to  
Philip J. Ganz, Jr., Esq. and Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

**PAGE TOTAL:** 3

**MESSAGE:** see attached

**CONFIDENTIAL TRANSMISSION**

The information contained in this facsimile message is legally privileged and confidential information which is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please notify us by telephone and return the original message to us via U.S. Mail to the address listed above. Thank you.

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO	3650	
CONNECTION TEL		915104446698
CONNECTION ID		
ST. TIME	09/30 20:23	
USAGE T	00'50	
PGS. SENT	3	
RESULT	OK	

GANZ & GORSLINE  
A Law Partnership  
11620 Wilshire Boulevard, Suite 340  
Los Angeles, CA 90025-1769  
*telephone 310 235-1700 facsimile 310 235-1707*

**FACSIMILE COVER LETTER**

September 30, 2007

**TO:** Daniel Siegel, Esq.  
Siegel & Yee

**FACSIMILE:** (510) 444-6698

**TELEPHONE:** (510) 839-1200

**FROM:** Rebecca Kounz, Legal Secretary to  
Philip J. Ganz, Jr., Esq. and Laurie Susan Gorsline, Esq.

**SUBJECT:** #5784 - Molly Paige v. Pacifica Foundation, etc, et al.

**PAGE TOTAL:** 3

**MESSAGE:** see attached

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of  
3 18 and not a party to the within action; my business address is 11620 Wilshire Blvd., Suite 340,  
Los Angeles, CA 90025-1769.

4 On October 1, 2007, I served the foregoing **NOTICE OF MOTION AND**  
5 **MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFF'S**  
6 **EMPLOYMENT FORM INTERROGATORIES AND REQUEST FOR**  
7 **MONETARY SANCTIONS IN THE SUM OF \$1,390.00 AGAINST**  
8 **DEFENDANTS PACIFICA FOUNDATION, EVA GEORGIA AND/OR THEIR**  
9 **COUNSEL PURSUANT TO C.C.P. §§ 2030.300, 2030.090, 2023.010;**  
10 **MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION OF**  
11 **LAURIE SUSAN GORSLINE IN SUPPORT THEREOF**  
12 by placing true copies thereof enclosed in sealed envelopes addressed as follows:

9 Daniel Siegel, Esq.  
Siegel & Yee  
10 499 14th Street, Suite 220  
Oakland, CA 94612  
11 Telephone: (510) 839-1200  
Attorney for Defendants  
12

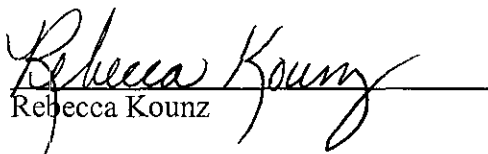
13 ☒ **BY MAIL** As follows: I am "readily familiar" with the firms practice of collection and  
14 processing correspondence for mailing. Under that practice it would be deposited with  
15 U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles,  
California in the ordinary course of business. I am aware that on motion of the party  
served, service is presumed invalid if postal cancellation date or postage meter date is  
more than one day after date of deposit for mailing in affidavit.

16 ☐ **BY FEDERAL EXPRESS** I am "readily familiar" with the firm's practice of collection  
17 and processing correspondence for deposit with Federal Express. Under that practice it  
18 would be deposited with Federal Express on that same day with fees thereon fully  
19 prepaid at Los Angeles, California in the ordinary course of business. I am aware that on  
motion of the party served, service is presumed invalid if date of receipt of the document  
by Federal Express is more than one day after date of deposit for mailing in affidavit.

20 ☐ **BY PERSONAL SERVICE** I delivered such envelope by hand to the above-identified  
21 recipient.

22 ☒ **STATE** I declare under penalty of perjury under the laws of the State of California that  
the foregoing is true and correct.

23 Executed on October 1, 2007 at Los Angeles, California.

24  
25   
26 Rebecca Kounz