



SUPERIOR COURT OF SAN MATEO COUNTY
 400 County Center 1050 Mission Road
 Redwood City, CA 94063 South San Francisco, CA 94080
 www.sanmateocourt.org

Minute Order

MIKE ROSEN, et al vs. XIAO YAN CHEN, et al

16-CIV-02987

09/28/2018 9:00 AM

Motion to Compel Further

Hearing Result: Held

Judicial Officer: Greenberg, Susan

Location: Courtroom 2B

Courtroom Clerk: Rosa Vega

Courtroom Reporter: Diane Pessagno

Parties Present

KASS, BRADLEY Attorney
 MILLER, LAWRENCE D. Attorney

Minutes

Journals

- Above-noted counsel present.

Argument presented by counsel. Matter submitted.

Tentative ruling modified and becomes order:

MOTION TO COMPEL FURTHER RESPONSES TO PLAINTIFF'S DEMAND FOR PRODUCTION OF DOCUMENTS

The motion to compel further responses to Demand for Production of Documents is granted as to categories 2 through 44. For each category or document to which Defendant asserted the objection of "attorney-client, work product, privacy or any other applicable privileges," Defendant "shall provide sufficient factual information for other parties to evaluate the merits of that claim, including, if necessary, a privilege log." (Code Civ. Proc. 2031.240, subd. (c)(1).) All other objections lack merit.

Other than documents identified as privileged or private, Defendant shall supplement her responses with "a statement that the party will comply with the particular demand for inspection, copying, testing, or sampling by the date set for the inspection, copying, testing, or sampling," or "a representation that the party lacks the ability to comply with the demand for inspection, copying, testing, or sampling of a particular item or category of item." (Code of Civ. Proc. section 2031.210, subd. (a)(1) & (2).) To the extent Defendant lacks ability to comply, the supplemental response shall fully comply with Code of Civil Procedure section 2031.230.

The motion to compel further response to demand for inspection of property is granted. Defendant's objections lack merit. Inspection of the property is relevant to the subject matter of this action; the request is not overbroad.

The motions to compel production of documents and to compel inspection of property are granted.

Plaintiff's request for sanctions is granted in the amount of \$4,090.00, against Defendant Xiao Yan Chen and her attorneys Bradley Kass and the Kass & Kass Law Office, jointly and severally.

Defendant shall serve verified supplemental responses to Document Categories 2 through 44, and to the Demand for Inspection of Property, no later than October 19, 2018, or two weeks after service of written notice of this ruling. Documents and Inspection shall be provided by 10/26/18.

Defendant Xiao Yan Chen, attorney Bradley Kass, and the Kass & Kass Law Offices shall pay, jointly and severally, a monetary sanction of \$4,090.00 to Plaintiff Mike Rosen no later than October 19, 2018, or one week after service of written notice of this ruling.

Future Hearings and Vacated Hearings

November 06, 2018 9:30 AM Mandatory Settlement Conference
Grandsaert, John L.
Courtroom 2D

November 26, 2018 9:00 AM Jury Trial
Master Calendar, -