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12 Attorneys for Plaintiff

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF ORANGE**

15  
16 RICKK MONTOYA

17 Plaintiff,

18 v.

19 CITY OF GARDEN GROVE, CALIFORNIA;  
and Does 1-100, inclusive,

20 Defendants.  
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23

CASE NO. 30-2015-00799522

**PLAINTIFF'S FIRST SET OF SPECIAL  
INTERROGATORIES TO DEFENDANT  
CITY OF GARDEN GROVE,  
CALIFORNIA**

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1 PROPOUNDING PARTY: Plaintiff RICKK MONTOYA  
2 RESPONDING PARTY: Defendant CITY OF GARDEN GROVE, CALIFORNIA  
3 SET NO.: One

4 Pursuant to the *Code of Civil Procedure*, Plaintiff Rickk Montoya (“Plaintiff”) hereby  
5 requests that Defendant City of Garden Grove, California (“Garden Grove” or “Defendant”)  
6 respond to these Interrogatories in the time and manner prescribed by California *Code of Civil*  
7 *Procedure* § 2030.010, et seq.

8 **INTERROGATORIES**

9 **SPECIAL INTERROGATORY NO. 1**

10 IDENTIFY THE RESIDENCE ADDRESS of Bao Nguyen (For purposes of these  
11 interrogatories “IDENTIFY THE RESIDENCE ADDRESS” shall mean to state the address at  
12 which the person resided within the City of Garden Grove, California when that person ran for the  
13 elected office of member of the city council of Garden Grove. Where a person has run for such  
14 elected office on more than one occasion, and resided at different addresses at the respective times  
15 that he/she ran for such office, “IDENTIFY THE RESIDENCE ADDRESS” shall mean to state  
16 each such address at which that person has resided, as well as the corresponding election’s year).

17 **SPECIAL INTERROGATORY NO. 2**

18 IDENTIFY THE RESIDENCE ADDRESS of Steve Jones.

19 **SPECIAL INTERROGATORY NO. 3**

20 IDENTIFY THE RESIDENCE ADDRESS of Christopher Phan.

21 **SPECIAL INTERROGATORY NO. 4**

22 IDENTIFY THE RESIDENCE ADDRESS of Phat Bui.

23 **SPECIAL INTERROGATORY NO. 5**


24 IDENTIFY THE RESIDENCE ADDRESS of Kris Beard.

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1 Dated: August 26, 2015

**R. REX PARRIS LAW FIRM**

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Jonathan Douglass, Esq.  
Attorneys for Plaintiff Rickk Montoya



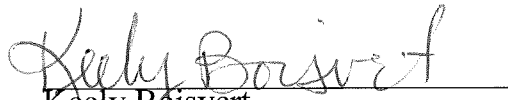
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**BY FEDERAL EXPRESS/OVERNIGHT MAIL as follows:** I placed such envelope in a Federal Express Mailer addressed to the above party or parties at the above address(es), with delivery fees fully pre-paid for next-business-day delivery, and delivered it to a Federal Express pick-up driver before 4:00 p.m. on the stated date.

**BY ELECTRONIC SERVICE as follows:** Based on a court order, or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addressed listed on the attached Service List.

Executed on August 26, 2015, at Lancaster, California.

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

  
Keely Boisvert

**SERVICE LIST**

*Montoya v. City of Garden Grove, California, et al.*

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