1 2 3 4 5 6 7 8	Kevin I. Shenkman (SBN 223315) Mary R. Hughes (SBN 222662) John L. Jones II (SBN 225411) SHENKMAN & HUGHES 28905 Wight Road Malibu, California 90265 Telephone: (310) 457-0970 R. Rex Parris (SBN 96567) Robert A. Parris (SBN 158720) Jonathan W. Douglass, Esq. (SBN 289300) R. REX PARRIS LAW FIRM 43364 10th Street West Lancaster, California 93534 Telephone: (661) 949-2595 Facsimile: (661) 949-7524 Milton C. Grimes (SBN 59437)		
10 11	LAW OFFICES OF MILTON C. GRIME 3774 West 54 th Street Los Angeles, California 90043 Telephone: (323) 295-3023	S	
12	Attorneys for Plaintiff		
13	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
14	COUNTY	OF ORANGE	
15			
16	RICKK MONTOYA	CASE NO. 30-2015-00799522	
17	Plaintiff,	PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT	
18	V.	CITY OF GARDEN GROVE, CALIFORNIA	
19	CITY OF GARDEN GROVE, CALIFORNIA; and Does 1-100, inclusive,		
20	Defendants.		
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	PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT CITY OF GARDEN GROVE		

Plaintiff RICKK MONTOYA PROPOUNDING PARTY: 1 Defendant CITY OF GARDEN GROVE, CALIFORNIA **RESPONDING PARTY:** 2 3 SET NO.: One Pursuant to the Code of Civil Procedure, Plaintiff Rickk Montoya ("Plaintiff") hereby 4 requests that Defendant City of Garden Grove, California ("Garden Grove" or "Defendant") 5 respond to these Interrogatories in the time and manner prescribed by California Code of Civil 6 7 Procedure § 2030.010, et seq. INTERROGATORIES 8 9 SPECIAL INTERROGATORY NO. 1 IDENTIFY THE RESIDENCE ADDRESS of Bao Nguyen (For purposes of these 10 interrogatories "IDENTIFY THE RESIDENCE ADDRESS" shall mean to state the address at 11 which the person resided within the City of Garden Grove, California when that person ran for the 12 elected office of member of the city council of Garden Grove. Where a person has run for such 13 elected office on more than one occasion, and resided at different addresses at the respective times 14 that he/she ran for such office, "IDENTIFY THE RESIDENCE ADDRESS" shall mean to state 15 each such address at which that person has resided, as well as the corresponding election's year). 16 17 SPECIAL INTERROGATORY NO. 2 IDENTIFY THE RESIDENCE ADDRESS of Steve Jones. 18 **SPECIAL INTERROGATORY NO. 3** 19 20 IDENTIFY THE RESIDENCE ADDRESS of Christopher Phan. SPECIAL INTERROGATORY NO. 4 21 IDENTIFY THE RESIDENCE ADDRESS of Phat Bui. 22 SPECIAL INTERROGATORY NO. 5 23 IDENTIFY THE RESIDENCE ADDRESS of Kris Beard. 24 25 1/// 26 || / / / 27 28 III

Dated: August 26, 2015

R. REX PARRIS LAW FIRM

Attorneys for Plaintiff Rickk Montoya

Jonathan Douglass, Esq.

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PROOF OF SERVICE 1013A(3) CCP Revised 5/1/88

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2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 3 I am employed in the County of Los Angeles, State of California. I am over the 4 age of 18 and not a party to the within action; my business address is: 43364 10th Street 5 West, Lancaster, California 93534. On August 26, 2015, I served the foregoing document described as **PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES TO** 6 **DEFENDANT CITY OF GARDEN GROVE, CALIFORNIA** by placing the 7 original a true copy thereof enclosed in sealed envelopes addressed as follows: 8 *** See Attached Service List *** 9 10 BY MAIL as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U. S. postal service on that same day with postage thereon fully prepaid at Lancaster, California in the ordinary course of business. I 11 X12 am aware that on motion of the party served, service is presumed invalid if postal 13 cancellation date or postage meter date is more than one day after date of deposit 14 for mailing in affidavit. 15 BY PERSONAL SERVICE as follows: I delivered such envelope by hand to the addressees at 16 17 I caused the foregoing document described hereinabove to be personally delivered by hand by placing it in a sealed envelope or package addressed to the persons at the addresses listed on the attached service list and provided it to a professional messenger service whose name and business address is Team Legal, Inc., 963 18 19 West Avenue J, Lancaster, CA 93534. 20 I caused the foregoing document described hereinabove to be personally delivered by hand by placing it in a sealed envelope or package addressed to the persons at the addresses listed on the attached service list and provided it to a professional messenger service whose name and business address is First Legal Support 21 22 23 Services, 1511 West Beverly Blvd., Los Angeles, CA 90026. 24 BY FACSIMILE as follows: I served such document(s) by fax at See Service List to the fax number provided by each of the parties in this litigation at BY FACSIMILE as follows: $[\]$ 25 Lancaster, California. I received a confirmation sheet indicating said fax was 26 transmitted completely. 2.7

1 2	[]	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
3		the stated date.
4 5		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.
6		
7		Executed on August 26, 2015, at Lancaster, California.
8	<u>X</u>	(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
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10		Keely Boisvert
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SERVICE LIST *Montoya v. City of Garden Grove, California, et al.*

James H. Eggart Wooruff, Spradlin & Smart, APC 555 Anton Blvd, Suite 1200 Costa Mesa, CA 92626-7670 Telephone: (714) 558-7000 Facsimile: (714) 835-7787

Attorney for Defendant City of Garden Grove, California