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LOS ANGELES SUPERIOR COURT

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1 FREEDMAN & TAITELMAN, LLP  
2 Bryan J. Freedman (SBN #151990)  
3 bfreedman@ftllp.com  
4 Jesse A. Kaplan (SBN #255059)  
5 jkaplan@ftllp.com  
6 1901 Avenue of the Stars, Suite 500  
7 Los Angeles, California 90067  
8 TEL: (310) 201-0005  
9 FAX: (310) 201-0045  
10  
11 Attorneys for Third-Party London & Company, LLP

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES

12 A.M. YOUNG,  
13 Petitioner,  
14 vs.  
15 K.E. WALSH,  
16 Respondent.

) Case No. BD497364  
)  
) **THIRD-PARTY LONDON & COMPANY,**  
) **LLP MEMORANDUM OF POINTS AND**  
) **AUTHORITIES IN OPPOSITION TO**  
) **MOTION COMPELLING FURTHER**  
) **RESPONSES TO SUBPOENA;**  
) **SUPPORTING DECLARATIONS OF JESSE**  
) **KAPLAN AND ANDREW MEYER**  
)  
) Date: June 10, 2009  
) Time: 8:45 a.m.  
) Dept.: 43

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1 **I. INTRODUCTION**

2 It has always been London's intention to produce all documents requested by petitioner  
3 Alex Young ("Young"), regardless of whether they are responsive to Young's overbroad subpoena  
4 or not. As a result, London initially engaged in a diligent and good faith search, spent 12.5 man  
5 hours doing so, and produced approximately 3,000 pages of documents.

6 Because Young's requests are so unreasonably overbroad and lack any degree of  
7 particularity, and because Young's counsel had refused to identify any categories of documents that  
8 Young wanted London to look for, London was faced with the task of looking for any and all  
9 documents that might be in anyway tangentially related to Young or Kate Walsh ("Walsh").  
10 Though Young essentially refuses to meet and confer on the issue of defining the scope of London's  
11 search, London has went well beyond what is required or would be reasonable to ensure that it has  
12 left no stone unturned. In doing so, London has enlisted four employees and spent **an additional 46**  
13 **man hours** to ensure that it has produced all documents that might fall within the scope of the  
14 Subpoena, and produced all documents related to Young or Walsh. Furthermore, London has  
15 provided a declaration from its custodian of records stating that "**all of the records described** in the  
16 Subpoena for Production of Business Records ("Subpoena") except for the documents identified in  
17 Document Request D. London does not have any of the documents responsive to Document  
18 Request D." (emphasis added). Accordingly, Young's motion to compel is moot.

19 Moreover, Young's counsel has failed to adequately meet and confer. In addition to taking  
20 the position that he does not have any obligation to tell London specifically what documents it is  
21 required to produce and help define the scope of the Subpoena, Young has failed to meet and confer  
22 with London's counsel regarding the deficiency in the declaration from its custodian of records.  
23 Clearly, Young could have avoided making this motion by doing so.

24 **II. BACKGROUND**

25 London is a certified public accounting firm. London, in particular Andrew Meyer, had  
26 previously performed accounting services for both Young and respondent K.E. Walsh ("Walsh").

1 After learning of Walsh and Young's separation in December, 2008, Meyer continued paying bills  
2 for both Walsh and Young as his office had done in the past.

3 In January 2009, Young requested that London provide his attorney with certain financial  
4 information concerning Young and Walsh. Moreover, on or around January 27, 2009, Young's new  
5 attorney sent a letter to Meyer, accusing him of withholding documents and other wrongdoing. In  
6 fact, Young's counsel went as far as to recommend that Meyer and London hire counsel to represent  
7 them in this matter. As a matter of practice London does not continue to represent clients that hire  
8 lawyers to send them unfounded, threatening letters accusing them of wrongdoing. Accordingly, on  
9 or around January 28, 2009, London severed its client relationship with Young. Additionally, on  
10 January 28, 2009, Meyer informed Young and Walsh that he was happy to release all financial  
11 information. In fact, Meyer was prepared to attend a meeting with all parties and counsel on  
12 February 5, 2009 and provide all financial information requested. Young, however, abruptly  
13 canceled that meeting.

14 On February 18, 2009, Young's counsel sent yet another threatening letter to London and  
15 Meyer. (*See Exhibit "1"*). Again Young's counsel made unfounded blanket accusations that Meyer  
16 allegedly breached his fiduciary duties as well as claims that his representation of Walsh created a  
17 conflict of interest. Absent from Young's attorney's rhetoric were any specific accusations of  
18 wrongdoing. On February 24, 2009, London's attorney responded. (*See Exhibit "2"*). Again,  
19 London's counsel represented that London was willing to produce all requested financial documents  
20 if he obtained the consent of both parties.

21 On February 26, 2009, before London knew that Young had issued a subpoena, London sent  
22 Young's counsel accounting ledgers fully reflecting every accounting transaction for Walsh, Young  
23 or any related corporate entities that London had ever worked on. This consisted of well over **500**  
24 **pages of documents.**

25 On, February 25, 2009, Young's counsel issued a Deposition Subpoena For Production of  
26 Business Records (the "Subpoena") addressed to London's custodian of records. On March 3, 2009,

1 Young served a copy of the Subpoena on London. (See Exhibit "3"). The Subpoena required  
2 London to produce documents to the deposition officer in seven business days on March 12, 2009.  
3 The Subpoena requested documents from January 2007 through the date of production. Generally,  
4 the Subpoena called for financial documents such as statements for all accounts at financial  
5 institutions and checks. In addition to requests for financial documents, the subpoena contained  
6 several non-particularized, overbroad and ambiguous "catchall" requests including a request for  
7 "[a]ll documents in London & Co's possession, custody, or control concerning Alexander  
8 Young, any entity in which Alexander Young had or has an ownership interest, Katherine  
9 Walsh, and any entity in which Katherine Walsh has an ownership interest." (See Exhibit "3",  
10 Request E).

11 Over the next seven business days London attempted in good faith to locate documents that  
12 were responsive to the Subpoena. In doing so, London spent 12.5 man hours and located 3,000  
13 pages of documents. Based on the Subpoena's lack of particularity, this was a very difficult task.

14 On March 12, 2009, London hand delivered two large boxes consisting of 3,000 pages worth  
15 of documents to the deposition officer. In order to protect itself, London also delivered responses  
16 with objections to the deposition officer. (See Exhibit "4"). That is, based on the breadth of  
17 Young's request, and since it was unclear what Young was really requesting, London asserted  
18 objections<sup>1</sup>. In particular, London sought to object to the Subpoena on the grounds that it was  
19 overbroad and failed to identify the requested documents with reasonable particularity as required by  
20 C.C.P. § 2020.410.

21 While containing objections, London's responses clearly indicated that it was not  
22 withholding any documents based on those objections and although London was under no obligation  
23 to do so, it produced 3,000 pages worth of documents. London's responses also contained a  
24 schedule precisely outlining all documents that were produced.

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25  
26 <sup>1</sup> Because of a typographic error in the caption, on March 13, 2009, London also  
27 served Amended Objections on the deposition officer. (See Exhibit "4").



1 **and London attempted to fully comply with the requests by producing 3,000 documents which**  
2 London maintains encompasses all responsive documents within its custody and control," London's  
3 counsel requested that Sturman identify any documents that were missing so that London could look  
4 into any discrepancy. London's counsel also unequivocally agreed to provide Sturman with a  
5 declaration pursuant to Evidence Code § 1561. Finally, London's counsel reminded Sturman that  
6 Young had yet to pay London for the reasonable costs incurred in responding to the subpoena and  
7 that pursuant to Evidence Code § 1563(b), London was under absolutely no obligation to produce  
8 any records until that amount was paid.

9 Several hours later on April 14, 2009, Sturman sent another letter to London's counsel. (*See*  
10 Exhibit "7"). Again, Sturman failed to identify how London had failed to comply with the  
11 Subpoena. Rather, Sturman concluded that **"Accordingly, since London & Co. still has not**  
12 **complied with the Deposition Subpoena and there is no informal resolution of this issues raised**  
13 **in my April 7, 2009 letter I will file a Motion to Compel and request monetary sanctions**  
14 **against your client."**

15 On April 15, 2009, London provided all parties with a declaration from its custodian of  
16 records pursuant to Evidence Code § 1561. (*See* Exhibit "8").

17 Prior to filing this motion, Young's counsel never attempted to meet and confer regarding the  
18 inadequacy of London's custodian of records declaration that was provided on April 15, 2009. That  
19 is, Mr. Sturman never attempted to contact London's counsel to informally resolve this issue. At  
20 best, Young's counsel declaration in opposition to London's motion for a protective order stated in  
21 passing that "On April 15, 2009, I received the Declaration of Andrew Meyer Pursuant to Evidence  
22 Code § 1561. This declaration did not state whether London & Co. had produced all of the  
23 documents responsive to the Deposition Subpoena For Production Of Business records or just some  
24 of the documents" (*See* Exhibit "9"). Despite Mr. Sturman's commentary, he failed to meet and  
25 confer with London's counsel about this error prior to filing the motion to compel.

26 On May 18, 2009, London's counsel, Jesse Kaplan, contacted Mr. Sturman by telephone to  
27

1 further meet and confer regarding resolving the dispute regarding the Subpoena. Again, Mr. Kaplan  
2 assured Mr. Sturman that it has always been London's intent to provide Young with all documents  
3 that he was requesting and that London is neither withholding documents based on those objections,  
4 nor does it intend on doing so. Mr. Kaplan **also indicated that it was not his intention to argue**  
5 **over objections, but to work with his office to identify what documents or categories of**  
6 **documents Young thought may not have been produced by London, so that London can search**  
7 **for, locate and produce those documents.** Mr. Kaplan further indicated that London had  
8 experienced difficulty in searching for documents, in particular in response to Request E, and that  
9 London needed Young's assistance in clarifying what categories of documents Young was looking  
10 for.

11 During this conversation, Mr. Kaplan indicated that London was searching for documents  
12 that Young had identified in his motion to compel and opposition to London's motion for a  
13 protective order. In particular: 1) W2s, 1099s and tax related documents; 2) American Express  
14 Statements; 3) invoices, bills and other documents regarding furnishings; and 4) invoices, bills and  
15 other documents regarding home improvements.

16 During this conversation, Mr. Sturman also identified several other categories of documents  
17 that Young was interested in: 1) contracts relating to Walsh or Young's employment (i.e. Grey's  
18 Anatomy) and documents evidencing their payment under same; 2) documents relating to all  
19 accounts utilized by or on behalf of Walsh or Young; 3) any subsidiary ledgers (i.e. ledgers for home  
20 furnishings); 4) documents used to prepare financial statements; and 5) correspondence with  
21 third-parties (i.e. a letter regarding a payment dispute). Mr. Kaplan also indicated that London  
22 would look for any documents that are responsive to these categories, and if they exist and were not  
23 already produced, London would produce those documents over objections, regardless of whether  
24 they are actually responsive to the subpoena or not.

25 Finally, Mr. Kaplan represented that London would provide Young with a custodian of  
26 records declaration that indicates that the documents produced are all the records described in the  
27

1 Subpoena. Mr. Kaplan indicated that London would do so once London has completed its search for  
2 the new categories of documents identified by Young.

3 Later that day, Mr. Kaplan sent Mr. Sturman a letter memorializing our conversation (*See*  
4 Exhibit "10"). On May 19, 2009, Mr. Sturman sent a letter in response (*See* Exhibit "11").  
5 Although Mr. Sturman's letter was somewhat instructive in detailing categories of documents that  
6 Young wanted London to look for, Mr. Sturman claimed that "[y]ou continue to suggest  
7 (incorrectly) that Mr. Young has an obligation to tell London & Co. specifically what documents it  
8 is required to produce when that is contrary to law" (*See* Exhibit "11"). Mr. Sturman also claimed  
9 that Mr. Kaplan's letter contained points that were not discussed during their telephone  
10 conversation. Finally, this letter indicated that Mr. Sturman knew a great deal of what documents  
11 might exist and what he was interested in.

12 In addition to the new categories of documents identified by Young or his attorney, during  
13 the month of May 2009, London undertook the task of locating **any and all documents that were in**  
14 **any way tangentially related to Walsh, Young, or Walsh's corporation**, that may have not been  
15 produced. Over the past few weeks London has enlisted four London employees and spent  
16 approximately **46 man hours** to search for, locate, and assemble these documents.

17 On May 28, 2009, London produced additional documents and a supplemental Custodian of  
18 Records declaration stating that "all of the records described in the Subpoena for Production of  
19 Business Records ("Subpoena") except for the documents identified in Document Request D.  
20 London does not have any of the documents responsive to Document Request D" (*See* Exhibit "12").  
21 These documents were hand delivered two compact disks. London is not withholding any  
22 documents based on its objections.

### 23 **III. ARGUMENT.**

#### 24 **A. London Has Fully Complied with the Subpoena.**

25 Despite Young's reluctance in narrowing the scope of its document requests, and even  
26 though London was under no obligation to respond to the extremely overbroad Request E, London



1 responsibility to determine what measure and procedures are appropriate in varying circumstances."  
2 Obregon v. Superior Court, 67 Cal. App. 4th 424, 431 (1998).

3 1. **Young has failed to meet and confer regarding the breadth of the**  
4 **Subpoena, in particular Request E.**

5 London has constantly attempted to in good faith decipher Young's incredibly overbroad and  
6 non-particularized requests, and produce all responsive documents. London has also consistently  
7 expressed the difficulty posed in responding to the Subpoena, in particular Request E. Rather than  
8 engage in a debate over this, or any other objection, London has consistently requested that Young  
9 particularize its request and provide London with more narrowly defined categories in order to assist  
10 London locate and produce documents.

11 California Code of Civil Procedure § 2020.410 requires each demand for production of  
12 documents to set forth the documents requested with "reasonable" particularity. More specifically,  
13 "A deposition subpoena that commands only the production of business records for copying shall  
14 designate the business records to be produced either by specifically describing each individual item  
15 or by reasonably particularizing each category of item." California Code of Civil Procedure §  
16 2020.410(a). This requirement of reasonableness requires the categories of documents be  
17 reasonable from the standpoint of the party who is subject to the burden of production. See, Calcor  
18 Space Facility, Inc. v. Superior Ct., 53 Cal. App. 4th 216, 222 (1997). "Any other interpretation  
19 places too great a burden on the party on whom the demand is made." See, Calcor, 53 Cal. App. 4th  
20 at 222. Using document production devices to determine whether documents exist "[p]laces a great  
21 burden on the responding party, a burden which should generally be borne by the party seeking the  
22 discovery." See, Calcor, 53 Cal. App. 4th at 222.

23 Certain discovery methods have routinely been found improper, including, for example,  
24 "insufficient identification of the requested information to acquaint the other party with the nature of  
25 information desired, . . . or placing more burden upon the adversary than the value of the information  
26 warrants. Such improper methods of "fishing" should be controlled by the trial court under the

1 powers granted to it by the discovery statutes. The concerns for avoiding undue burdens on the  
2 adversary in the litigation apply with even more weight to a nonparty involved in discovery.”  
3 Calcor, 53 Cal. App. 4th at 224 (emphasis added). “[W]hen dealing with an entity which is not  
4 even a party to the litigation, the court should attempt to structure discovery in a manner which is  
5 least burdensome to such an entity. Calcor, 53 Cal. App. 4th at 222. “The discovery statutes give the  
6 trial court wide discretion in making such orders as may be necessary to protect parties from abuse  
7 or misuse of [discovery].” Moskowitz v. Superior Court, 137 Cal. App. 3d 313 (1982).

8 The Calcor Court, in applying its particular factual scenario to the law, held that:

9 Although facially Thiem's detailed description of categories, combined with the  
10 three pages of "definitions" and another three pages of "instructions" would seem  
11 to satisfy a requirement of "particularity," it is, in effect, a blanket demand and  
12 hardly constitutes "reasonable" particularity. As noted, Thiem's 12-page  
13 demand might as well be condensed into a single sentence: Produce everything  
14 in your possession which in any way relates to gun mounts. There is no  
15 indication the "categories" bear any relationship to the manner in which Calcor  
16 maintains its records. The burden is sought to be imposed on Calcor to search its  
17 extensive files, at many locations, to see what it can find to fit Thiem's  
18 definitions, instructions and categories. 53 Cal. App. 4th 216, 222. (Emphasis  
19 added)

20 Calcor essentially held that general blanket requests demanding any and all  
21 documents relating to a particular person or matter is facially improper, especially as against non-  
22 parties. This analysis can verbatim be applied to the underlying situation.

23 In particular, Young has requested “[a]ll documents in London & Co’s possession,  
24 custody, or control concerning Alexander Young, any entity in which Alexander Young had or  
25 has an ownership interest, Katherine Walsh, and any entity in which Katherine Walsh has an  
26 ownership interest.” This catchall request is hardly “reasonably” particularized, and basically just  
27 demands anything in any way relating to two different people and their various entities.

28 Despite London’s request that Young help London identify documents or categories of  
documents, Young has virtually refused to do so, especially prior to filing its motion to compel.  
While Young has identified several categories in his opposition to Young’s motion for a protective  
order, Young has otherwise taken the position that it has no obligation to meet and confer on this



1 obligation to attempt to reach an informal resolution of this dispute. Furthermore, as set forth above,  
2 London diligently attempted in good faith to comply with the Subpoena, despite the overbroad and  
3 unreasonable broad scope of d Request E. In doing so, London has already incurred substantial  
4 costs, including the cost of having four employees search for records. Therefore, even in the event  
5 this Court is inclined to grant all or part of the motion, no sanctions should issue against London or  
6 its counsel.

7 Therefore, in light of the foregoing, London is entitled to reasonable fees and costs in the  
8 amount of \$2,600.

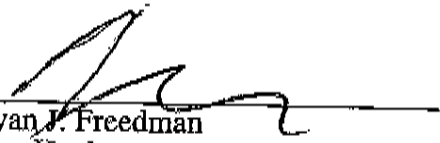
9 **IV. CONCLUSION**

10 Based on the forgoing, Young's motion to compel is moot. Moreover, London respectfully  
11 requests that the Court deny Young's request for sanctions..

12  
13 Dated: May 28, 2009

FREEDMAN & TAITELMAN, LLP

14  
15 By:

  
16 Bryan J. Freedman  
17 Jesse Kaplan  
18 Attorneys for Third-Party London & Co.



1 **Young, any entity in which Alexander Young had or has an ownership interest, Katherine**  
2 **Walsh, and any entity in which Katherine Walsh has an ownership interest.”** (Emphasis added)

3 A true and correct copy of that letter is attached hereto as **Exhibit “3”**.

4 6. On March 12, 2009, on behalf of London, my office hand delivered two large boxes  
5 consisting of 3,000 pages worth of documents to the deposition officer designated on the Subpoena.  
6 In order to protect London, we also delivered responses with objections to the deposition officer.  
7 That is, based on the breadth of Young’s request, and since it was unclear what Young was really  
8 requesting, London asserted objections. In particular, London sought to object to the Subpoena on  
9 the grounds that it was overbroad and failed to identify the requested documents with reasonable  
10 particularity as required by C.C.P. § 2020.410. A true and correct copy of London’s responses are  
11 attached hereto as **Exhibit “4”**<sup>2</sup>.

12 7. While containing objections, London’s responses clearly indicated that it was not  
13 withholding any documents based on those objections and although London was under no obligation  
14 to do so, it produced 3,000 pages worth of documents. London’s responses also contained a  
15 schedule precisely outlining all documents that were produced.

16 8. Additionally, so that there was not confusion, London’s 3,000 page document  
17 production and objections were accompanied by a cover letter indicating that London was delivering  
18 both objections and documents responsive to the Subpoena. The cover letter further requested that  
19 London be reimbursed for all reasonable costs incurred in locating and compiling the subpoenaed  
20 documents, including \$300 in copying costs (at ten cents a page), \$300 for time spent (\$24 an hour)  
21 and \$71.66 in messenger fees. While London was under no obligation to do so, London’s counsel  
22 faxed a courtesy copy of the Cover Letter and Objections to all counsel of record. A true and correct  
23 copy of that letter is also attached hereto as **Exhibit “4”**.

24 9. Initially, neither Young nor Young’s counsel has even responded to London’s tender  
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26 <sup>2</sup> Because of a typographic error in the caption, on March 13, 2009, London also  
27 served Amended Objections on the deposition officer.

1 of reasonable costs.

2 10. Young's counsel then waited almost a month before he decided to contract London  
3 about its production. On April 7, 2009, Young's counsel, Jeff Sturman sent a letter purporting to  
4 "meet and confer" regarding London's compliance with the Subpoena. A true and correct copy of  
5 that letter is attached hereto as **Exhibit "5"**.

6 11. Completely ignoring London's production of 3,000 documents and Young's failure to  
7 pay London's reasonable costs in responding to the subpoena, Mr. Sturman not only accused  
8 London of not complying with the subpoena, but again claimed London breached its fiduciary  
9 duties. Moreover, Sturman's letter was completely cryptic in that he failed to indicate what he  
10 wanted from London. Other than admonishing London for failing to provide a declaration pursuant  
11 to Evidence Code § 1561 and making blanket claims that London had asserted objections to  
12 "withhold documents," Sturman failed to identify any deficiencies in London's 3,000 page  
13 production. Sturman failed to identify any document or even category of documents that were not  
14 included in London's 3,000 page production.

15 12. Sturman's letter also unilaterally imposed ultimatum that he would move to compel  
16 and seek monetary sanctions "[u]nless all issues regarding London & Co.'s failure to comply  
17 with the Deposition Subpoena are resolved by 5:00 p.m. on Tuesday April 14, 2009...".

18 13. On April 14, 2009, London's counsel sent a meet and confer letter responding to  
19 Sturman's letter. A true and correct copy of that letter is attached hereto as **Exhibit "6"**.

20 14. Rather than confront Sturman about his litigation tactics, we offered to "**work with**  
21 **your office to resolve any perceived deficiencies in London's response**" and suggested that they  
22 schedule an in-person meeting or telephonic conference to discuss London's response. After  
23 reminding Sturman that "**not a single request went unanswered, and London attempted to fully**  
24 **comply with the requests by producing 3,000 documents which London maintains**  
25 **encompasses all responsive documents within its custody and control,"** we requested that  
26 Sturman identify any documents that were missing so that London could look into any discrepancy.

1 We also unequivocally agreed to provide Sturman with a declaration pursuant to Evidence Code §  
2 1561.

3 15. Finally, London's counsel reminded Sturman that Young had yet to pay London for  
4 the reasonable costs incurred in responding to the subpoena and that pursuant to Evidence Code §  
5 1563(b), London was under absolutely no obligation to produce any records until that amount was  
6 paid.

7 16. Several hours later on April 14, 2009, Sturman sent another letter to London's  
8 counsel. A true and correct copy of that letter is attached hereto as **Exhibit "7"**. Again, Sturman  
9 failed to identify how London had failed to comply with the Subpoena. Rather, Sturman concluded  
10 that **"Accordingly, since London & Co. still has not complied with the Deposition Subpoena**  
11 **and there is no informal resolution of this issues raised in my April 7, 2009 letter I will file a**  
12 **Motion to Compel and request monetary sanctions against your client."**

13 17. On April 15, 2009, London provided all parties with a declaration from its custodian  
14 of records pursuant to Evidence Code § 1561. A true and correct copy of that declaration is attached  
15 hereto as **Exhibit "8"**.

16 18. On May 1, 2009, Young's counsel tendered payment for reasonable costs incurred in  
17 responding to the subpoena and that pursuant to Evidence Code § 1563(b) .

18 19. On or about May 5, 2009, Young opposed London's motion for a protective order. A  
19 true and correct copy of Mr. Sturman's declaration in opposition to the motion for a protective order  
20 is attached hereto as **Exhibit "9."**

21 20. On May 5, 2009, Young filed this motion to compel.

22 21. On May 18, 2009, I contacted Mr. Sturman by telephone to further meet and confer  
23 regarding resolving the dispute. Again, I assured Mr. Sturman that it has always been London's  
24 intent to provide Young with all documents that he was requesting and that London is neither  
25 withholding documents based on those objections, nor does it intend on doing so. **I also indicated**  
26 **that it was not my intention to argue over objections, but to work with his office to identify**

1 **what documents or categories of documents, whether responsive to the Subpoena or not,**  
2 **Young though may not have been produced by London, so that London can search for, locate**  
3 **and produce those documents.** I further indicated that London had experienced difficulty in  
4 searching for documents, in particular in response to Request E, and that London needed Young's  
5 assistance in clarifying what categories of documents Young was looking for.

6 22. During this conversation, I indicated that London was searching for documents that  
7 Young had identified in his motion to compel and opposition to London's motion for a protective  
8 order. In particular, 1) W2s, 1099s and tax related documents; 2) American Express Statements; 3)  
9 invoices, bills and other documents regarding furnishings; and 4) invoices, bills and other documents  
10 regarding home improvements.

11 23. During this conversation, Mr. Sturman also identified several other categories of  
12 documents that Young was interested in: 1) contracts relating to Walsh or Young's employment (i.e.  
13 Grey's Anatomy) and documents evidencing their payment under same; 2) documents relating to all  
14 accounts utilized by or on behalf of Walsh or Young; 3) any subsidiary ledgers (i.e. ledgers for home  
15 furnishings); 4) documents used to prepare financial statements; and 5) correspondence with  
16 third-parties (i.e. a letter regarding a payment dispute). I indicated that London would look for any  
17 documents that are responsive to these categories, and if they exist and were not already produced,  
18 London would produce those documents over objections, regardless of whether they are actually  
19 responsive to the subpoena or not.

20 24. Finally, I indicated that London would provide Young with a custodian of records  
21 declaration that indicates that the documents produced are all the records described in the Subpoena.  
22 I indicated that London would do so once London has completed its search for the new categories of  
23 documents identified by Young.

24 25. Later that day, I sent Mr. Sturman a letter memorializing our conversation. A true  
25 and correct copy of that letter is attached hereto as **Exhibit "10"**.

26 26. On May 19, 2009, Mr. Sturman sent a letter in response, a true and correct copy of  
27

1 which is attached hereto as **Exhibit "11"**.

2 27. On May 28, 2009, London produced additional documents and a supplemental  
3 Custodian of Records declaration stating that "all of the records described in the Subpoena for  
4 Production of Business Records ("Subpoena") except for the documents identified in Document  
5 Request D. London does not have any of the documents responsive to Document Request D." A  
6 true and correct copy of that declaration is attached hereto as **Exhibit "12"**. These documents were  
7 put onto two compact disks. London is not withholding any documents based on its objections.

8 28. My office spent 8 hours preparing this motion at a rate of \$200 per hour (\$1,600).  
9 We also anticipate spending an additional three hours appearing in court for the hearing of this  
10 motion as well as well as two hours reviewing Young's reply, if any, and preparing for the hearing  
11 (\$1,000). London requests sanctions in these amounts.

12 29. I hereby declare under penalty of perjury under the laws of the State of California that  
13 the foregoing is true and correct.

14 Executed this 28th day of May 2009, at Los Angeles, California.

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18 Jesse Kaplan  
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1 24, 2009, my attorney responded.

2 9. On February 26, 2009, I sent Young's counsel ledgers fully reflecting every  
3 accounting transaction for Walsh, Young or any related corporate entities that London had worked  
4 on during the course of their marriage. This consisted of well over **500 pages of documents**.

5 10. On March 3, 2009, Young served a copy of a Deposition Subpoena For Production  
6 of Business Records (the "Subpoena") on London. The Subpoena required London to produce  
7 documents to the deposition officer in seven business days on March 12, 2009. The Subpoena  
8 requested documents from January 2007 through the date of production. Generally, the Subpoena  
9 called for financial documents such as statements for all accounts at financial institutions and  
10 checks. In addition to requests for financial documents, the subpoena contained several non-  
11 particularized, overbroad and ambiguous "catchall" requests, including a request for "[a]ll  
12 **documents in London & Co's possession, custody, or control concerning Alexander Young,**  
13 **any entity in which Alexander Young had or has an ownership interest, Katherine Walsh, and**  
14 **any entity in which Katherine Walsh has an ownership interest.**" (Emphasis added)

15 11. Over the next seven business days several London employees, including myself,  
16 attempted in good faith to locate documents that were responsive to the Subpoena. In doing so,  
17 London spent **12.5** man hours and located **3,000 pages** of documents. Based on the Subpoena's lack  
18 of particularity, this was a very difficult task. It was unclear what I was supposed to be looking for.  
19 With that said, my staff attempted to locate all documents that we believed were responsive to the  
20 Subpoena.

21 12. On March 12, 2009, London hand delivered two large boxes consisting of 3,000  
22 pages worth of documents to our attorney to deliver to the deposition officer.

23 13. Though London has located and produced 3,000 documents, I was willing to work  
24 with Young to determine what documents, if any, were not included in that production and resolve  
25 any discrepancy.

1 14. On April 15, 2009, I executed a declaration pursuant to Evidence Code § 1563(b).

2 15. I subsequently learned that there were additional documents that Young believed  
3 were not produced. From early May 2009, through May 27, 2009, London searched for 1) W2s,  
4 1099s and tax related documents; 2) American Express Statements; 3) invoices, bills and other  
5 documents regarding furnishings; and 4) invoices, bills and other documents regarding home  
6 improvements.

7 16. Moreover, in addition to the new categories of documents identified by Young or his  
8 attorney, during the month of May 2009, London undertook the task of locating any and all  
9 documents that were in any way tangentially related to Walsh, Young, or Kate Walsh's  
10 corporation, that may have not been produced.

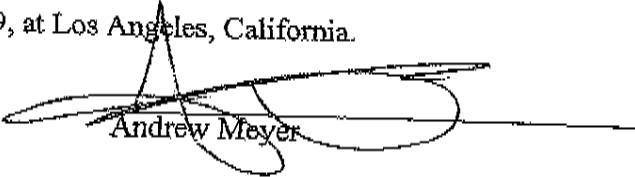
11 17. On May 28, 2009, London produced all additional documents that it was able to  
12 locate. London is not withholding any documents based on objection or otherwise.

13 18. Over the past few weeks London has enlisted four London employees and spent  
14 approximately 46 man hours to search for, locate, and assemble these documents.

15 19. I also executed a new declaration pursuant to Evidence Code § 1561 indicating that  
16 London had produced "all of the records described in the Subpoena for Production of Business  
17 Records ("Subpoena") except for the documents identified in Document Request D. London does  
18 not have any of the documents responsive to Document Request D."

19 20. I hereby declare under penalty of perjury under the laws of the State of California that  
20 the foregoing is true and correct.

21 Executed this 28th day of May 2009, at Los Angeles, California.

22  
23   
24 Andrew Meyer  
25  
26  
27  
28

**KOLODNY & ANTEAU**  
9100 Wilshire Boulevard - Ninth Floor, West Tower  
Beverly Hills, California 90212-3425  
(310) 271-5533 Fax (310) 271-3918

**ATTACHMENT 3 TO DEPOSITION SUBPOENA**

**The documents requested are for the time period  
January 1, 2007 through and including the date of production**

3.  
The records to be produced are described as follows:

A. Copies of complete statements for all accounts at financial institutions including, but not limited to, accounts at banks, brokerage firms, mutual funds, hedge funds, and private equity funds, which accounts are:

- (1) Held in the name of Alexander Young (also known as "Alex Young"),
- (2) Held in the name of any entity in which Alex Young had or has an ownership interest,
- (3) Held in the name of Katherine Walsh (also known as "Kate Walsh"), and,
- (4) Held in the name of any entity in which Katherine Walsh had or has an ownership interest.

B. Copies of all checks (both front and back) written from any account at a financial institutions including, but not limited to, accounts at banks, brokerage firms, mutual funds, hedge funds, and private equity funds, which accounts are:

- (1) Held in the name of Alexander Young,
- (2) Held in the name of any entity in which Alex Young had or has an ownership interest,
- (3) Held in the name of Katherine Walsh, and,
- (4) Held in the name of any entity in which Katherine Walsh had or has an ownership interest.

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- C. Copies of all correspondence received by anyone at London & Co. or sent by anyone at London & Co. concerning Alexander Young, any entity in which Alexander young had or has an ownership interest, Katherine Walsh, and any entity in which Katherine Walsh had or has an ownership interest.
- D. Copies of any documents pursuant to which London & Co. performed services for Alexander Young, any entity in which Alexander young had has an ownership interest, Katherine Walsh, and any entity in which Katherine Walsh had or has an ownership interest. The documents requested include, but are not limited to, retainer letters and engagement letters.
- E. To the extent not requested by any of the categories above, copies of all documents in London & Co.'s possession, custody or control concerning Alexander Young, any entity in which Alexander Young had or has an ownership interest, Katherine Walsh, and any entity in which Katherine Walsh had or has an ownership interest. The documents requested include, but are not limited to, contracts, letters, memoranda, notes, and printed copies of emails (emails that have already been printed, emails that are saved on London & Co.'s computer system, and emails that are saved in email accounts that used by London & Co.'s owners or employees).

**KOLODNY & ANTEAU**  
9100 Wilshire Boulevard - Ninth Floor, West Tower  
Beverly Hills, California 90212-3425  
(310) 271-5533 Fax (310) 271-3918

1 Stephen A. Kolodny, State Bar No. 38026  
2 Jeff M. Sturman, State Bar No. 177695  
3 KOLODNY & ANTEAU  
4 9100 Wilshire Boulevard  
5 Ninth Floor, West Tower  
6 Beverly Hills, CA 90212-3425  
7 Telephone : 310-271-5533  
8 Telecopier : 310-271-3918

9 Attorneys for Petitioner, A.M YOUNG

10  
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES**

13 In re the Marriage of

14 Petitioner: A.M. Young

15 and

16 Respondent: K.E. Walsh

CASE NO. BD 497364

CERTIFICATE OF COMPLIANCE  
[C.C.P. § 1985.3; C.C.P. § 1985.6]

JUDGE: Rafael Ongkeko

DEPT: 43

17 I, JEFF M. STURMAN, declare and certify as follows:

18 1. I am a partner of Kolodny & Anteau, attorney of record for the Petitioner, A.M.  
19 YOUNG, the party seeking from a non-party witness, London & Company, 2800 Olympic  
20 Blvd., 2nd Fl., Santa Monica, CA 90404, certain specified records pertaining to the  
21 Respondent, consumer K.E. Walsh.

22 2. As required by *Code of Civil Procedure* §§ 1985.3, 1985.6, I gave notice to the  
23 consumer, K.E. Walsh, that her personal records are being sought in the following manner:

24 On February 25, 2009, I caused a copy of the attached Deposition Subpoena  
25 For Production Of Business Records and its attachments, together with the document  
26 entitled "Notice to Consumer or Employee and Objection," to be served on the consumer  
27 K.E. Walsh by having said documents personally delivered to the offices of her attorneys of  
28 record as follows:

/////

**KO LODNY & ANTEAU**  
9100 Wilshire Boulevard - Ninth Floor, West Tower  
Beverly Hills, California 90212-3425  
(310) 271-5533 Fax (310) 271-3918

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Laura Wasser, Esq.  
WASSER, COOPERMAN & CARTER  
2029 Century Park East, Suite 1200  
Los Angeles, CA 90067

I declare, under penalty of perjury pursuant to the laws of the State of California, that  
the foregoing is true and correct.

Executed this 25<sup>th</sup> day of February, 2009.

  
JEFF M. STURMAN  
Declarant



1 **I. GENERAL OBJECTIONS**

2  
3 1. Respondent objects to each request for documents in the Subpoena to the extent  
4 Petitioner failed to provide adequate notice and time to respond to the Subpoena as required by  
5 C.C.P. § 2020.410(c). More specifically, a subpoena may not command compliance earlier than 20  
6 days after issuance and 15 days after service of the deposition subpoena, whichever date is later.  
7 C.C.P. § 2020.410(c).

8 2. Respondent objects to each request for documents in the Subpoena to the extent the  
9 requests seek documents protected by privilege, including but not limited to the attorney-client  
10 privilege and the attorney work-product doctrine.

11 3. Respondent objects to each request for documents in the Subpoena to the extent the  
12 Subpoena is overbroad and fails to identify the requested documents with reasonable particularity as  
13 required by C.C.P. § 2020.410.

14 4. Respondent objects to each request for documents in the Subpoena to the extent that  
15 the request require Respondent to produce cumulative or duplicative materials.

16 5. Respondent objects to each request for documents in the Subpoena to the extent that  
17 the request is overly broad and seek documents neither relevant to the subject matter of the action  
18 nor reasonably calculated to lead to the discovery of admissible evidence.

19 6. Respondent objects to each request for documents in the Subpoena to the extent that  
20 the request requires Respondent to interview each of its agents, employees, and accountants to obtain  
21 all of the documents requested, on the grounds that such interviews would be unduly burdensome,  
22 costly and oppressive, such requests are not reasonably calculated to lead to the discovery of  
23 admissible evidence, and such requests call for the production of privileged documents.

24 7. Respondent objects to each request for documents in the Subpoena to the extent that  
25 the request requires Respondent to produce documents which are not in its possession, custody or  
26 control.

27  
28 **OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS**



1 **RESPONSE TO DOCUMENT REQUEST B:**

2 Respondent objects to this request for the reasons stated in its General Objections, which are  
3 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
4 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
5 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
6 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
7 unintelligible. Respondent additionally objects to the request on the ground that the request is  
8 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
9 the request seeks the production of documents which are protected by privilege, including but not  
10 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
11 objects to this request to the extent that the request seeks the production of documents which are  
12 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
13 request requires Respondent to produce documents which contain trade secrets or other confidential  
14 and proprietary information.

15 Notwithstanding these objections, and without waiving same, Respondent has produced the  
16 documents identified in Schedule A.

17 **RESPONSE TO DOCUMENT REQUEST C:**

18 Respondent objects to this request for the reasons stated in its General Objections, which are  
19 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
20 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
21 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
22 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
23 unintelligible. Respondent additionally objects to the request on the ground that the request is  
24 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
25 the request seeks the production of documents which are protected by privilege, including but not  
26 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
27

28 **OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS**

1 objects to this request to the extent that the request seeks the production of documents which are  
2 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
3 request requires Respondent to produce documents which contain trade secrets or other confidential  
4 and proprietary information.

5 Notwithstanding these objections, and without waiving same, Respondent has produced the  
6 documents identified in Schedule A.

7  
8 **RESPONSE TO DOCUMENT REQUEST D:**

9 Respondent objects to this request for the reasons stated in its General Objections, which are  
10 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
11 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
12 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
13 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
14 unintelligible. Respondent additionally objects to the request on the ground that the request is  
15 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
16 the request seeks the production of documents which are protected by privilege, including but not  
17 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
18 objects to this request to the extent that the request seeks the production of documents which are  
19 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
20 request requires Respondent to produce documents which contain trade secrets or other confidential  
21 and proprietary information.

22 Notwithstanding these objections, and without waiving same, Respondent responds as  
23 follows: None

24 **RESPONSE TO DOCUMENT REQUEST E:**

25 Respondent objects to this request for the reasons stated in its General Objections, which are  
26 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
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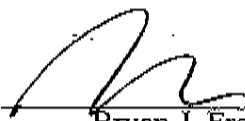
28 **OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR PRODUCTION  
OF BUSINESS RECORDS**

1 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
2 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
3 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
4 unintelligible. Respondent additionally objects to the request on the ground that the request is  
5 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
6 the request seeks the production of documents which are protected by privilege, including but not  
7 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
8 objects to this request to the extent that the request seeks the production of documents which are  
9 protected by a right of privacy.

10 Notwithstanding these objections, and without waiving same, Respondent has produced the  
11 documents identified in Schedule A.

12  
13  
14 Dated: March 12, 2009

FREEDMAN & TAITELMAN, LLP

15  
16 By:   
17 Bryan J. Freedman  
18 Attorneys for Third-Party London & Co.  
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Schedule "A"

1  
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4 BOX 1

- 5 • [REDACTED] Payroll 2008 (2 FILES)
- 6 • Kate Walsh Personal Articles
- 7 • Kate Walsh [REDACTED] 2009
- 8 • Kate Walsh [REDACTED] 2007
- 9 • Kate Walsh 2008 1099'S
- 10 • Kate Walsh [REDACTED] payroll 2008
- 11 • [REDACTED] employee file
- 12 • [REDACTED] contracts
- 13 • Misc. Kate Walsh
- 14 • Misc. [REDACTED]
- 15 • [REDACTED]
- 16 • 2007 Kate Walsh tax return
- 17 • 2007 [REDACTED] tax return

18  
19 BOX 2

- 20 • Kathleen Walsh [REDACTED] general account Jan 07- February 09
- 21 • Easy Tiger Trust [REDACTED] July 07- February 09
- 22 • Kathleen Walsh/Alexander Young [REDACTED] August 07- February 09
- 23 • Kathleen Walsh [REDACTED] money market account Jan 07- February 09
- 24 • Kathleen Walsh [REDACTED] account Jan 07- February 09
- 25 • Alexander Young [REDACTED] account August 07- December 08
- 26 • [REDACTED] Jan 07- February 09

- 1 • [REDACTED] money market account Jan 07- February 09
- 2 • Kathleen Walsh [REDACTED] mt September 08- January 09
- 3 • [REDACTED] Jan 07- December 08
- 4 • [REDACTED] February 07- May 07, August 07- December 07, February 08-  
5 June 08, August 08- December 08
- 6 • Alexander Young [REDACTED] January 07- December 07
- 7 • Alexander Young [REDACTED] t Plan January 07- December 08
- 8 • Alexander Young [REDACTED] September 07- December 07, February 08, April 08-  
9 December 08
- 10 • Alexander Young [REDACTED] March 07, September 07- December 07,  
11 February 08, April 08- December 08
- 12 • Alexander Young [REDACTED] September 07- December 07, February 08- December  
13 08
- 14 • Alexander Young [REDACTED] September 07- December 07, February 08- December  
15 08
- 16 • Alexander Young [REDACTED] September 07- December 07, February 08- December  
17 08

**OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1 FREEDMAN & TAITELMAN, LLP  
Bryan J. Freedman, Esq. (#151990)  
2 Jesse A. Kaplan, Esq. (#255059)  
1901 Avenue of the Stars, Suite 500  
3 Los Angeles, California 90067  
TEL: (310) 201-0005  
4 FAX: (310) 201-00045

5 Attorneys for Third-Party London & Company

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10

11

A.M. YOUNG,

) Case No. BD497364

12

) Petitioner,

13

) vs.

) **AMENDED OBJECTIONS OF LONDON &  
CO. TO DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**

14

) K.E. WALSH,

15

) Respondent.

16

17

18

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

19

Third-Party London & Co. ("Respondent ") hereby objects to the Deposition Subpoena For

20

Production of Business Records (the "Subpoena") addressed to the Custodian of Records of

21

Respondent and issued on or about February 25, 2009, by Jeff Sturman, an attorney for petitioner

22

Alexander Young.

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**AMENDED OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**

1  
2  
3 **I. GENERAL OBJECTIONS**

4 1. Respondent objects to each request for documents in the Subpoena to the extent  
5 Petitioner failed to provide adequate notice and time to respond to the Subpoena as required by  
6 C.C.P. § 2020.410(c). More specifically, a subpoena may not command compliance earlier than 20  
7 days after issuance and 15 days after service of the deposition subpoena, whichever date is later.  
8 C.C.P. § 2020.410(c).

9 2. Respondent objects to each request for documents in the Subpoena to the extent the  
10 requests seek documents protected by privilege, including but not limited to the attorney-client  
11 privilege and the attorney work-product doctrine.

12 3. Respondent objects to each request for documents in the Subpoena to the extent the  
13 Subpoena is overbroad and fails to identify the requested documents with reasonable particularity as  
14 required by C.C.P. § 2020.410.

15 4. Respondent objects to each request for documents in the Subpoena to the extent that  
16 the request require Respondent to produce cumulative or duplicative materials.

17 5. Respondent objects to each request for documents in the Subpoena to the extent that  
18 the request is overly broad and seek documents neither relevant to the subject matter of the action  
19 nor reasonably calculated to lead to the discovery of admissible evidence.

20 6. Respondent objects to each request for documents in the Subpoena to the extent that  
21 the request requires Respondent to interview each of its agents, employees, and accountants to obtain  
22 all of the documents requested, on the grounds that such interviews would be unduly burdensome,  
23 costly and oppressive, such requests are not reasonably calculated to lead to the discovery of  
24 admissible evidence, and such requests call for the production of privileged documents.

25 7. Respondent objects to each request for documents in the Subpoena to the extent that  
26 the request requires Respondent to produce documents which are not in its possession, custody or  
27 control.

28 **AMENDED OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**



1 **RESPONSE TO DOCUMENT REQUEST B:**

2 Respondent objects to this request for the reasons stated in its General Objections, which are  
3 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
4 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
5 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
6 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
7 unintelligible. Respondent additionally objects to the request on the ground that the request is  
8 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
9 the request seeks the production of documents which are protected by privilege, including but not  
10 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
11 objects to this request to the extent that the request seeks the production of documents which are  
12 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
13 request requires Respondent to produce documents which contain trade secrets or other confidential  
14 and proprietary information.

15 Notwithstanding these objections, and without waiving same, Respondent has produced the  
16 documents identified in Schedule A.

17 **RESPONSE TO DOCUMENT REQUEST C:**

18 Respondent objects to this request for the reasons stated in its General Objections, which are  
19 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
20 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
21 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
22 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
23 unintelligible. Respondent additionally objects to the request on the ground that the request is  
24 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
25 the request seeks the production of documents which are protected by privilege, including but not  
26 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
27

1 objects to this request to the extent that the request seeks the production of documents which are  
2 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
3 request requires Respondent to produce documents which contain trade secrets or other confidential  
4 and proprietary information.

5 Notwithstanding these objections, and without waiving same, Respondent has produced the  
6 documents identified in Schedule A.

7

8 **RESPONSE TO DOCUMENT REQUEST D:**

9 Respondent objects to this request for the reasons stated in its General Objections, which are  
10 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
11 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
12 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
13 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
14 unintelligible. Respondent additionally objects to the request on the ground that the request is  
15 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
16 the request seeks the production of documents which are protected by privilege, including but not  
17 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
18 objects to this request to the extent that the request seeks the production of documents which are  
19 protected by a right of privacy. Respondent additionally objects to this request to the extent that the  
20 request requires Respondent to produce documents which contain trade secrets or other confidential  
21 and proprietary information.

22 Notwithstanding these objections, and without waiving same, Respondent responds as  
23 follows: None

24 **RESPONSE TO DOCUMENT REQUEST E:**

25 Respondent objects to this request for the reasons stated in its General Objections, which are  
26 incorporated by reference as if fully stated herein. Respondent additionally objects to this request on  
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**AMENDED OBJECTIONS OF LONDON & CO. TO DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**

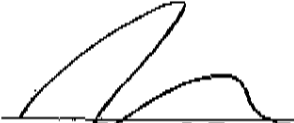
1 the ground that the request is overly broad, unduly burdensome and oppressive, and the request is not  
2 reasonably particularized, nor reasonably calculated to lead to the discovery of admissible evidence.  
3 Respondent further objects to the request on the ground that it so vague and ambiguous as to be  
4 unintelligible. Respondent additionally objects to the request on the ground that the request is  
5 compound, conjunctive and disjunctive. Respondent further objects to this request to the extent that  
6 the request seeks the production of documents which are protected by privilege, including but not  
7 limited to the attorney-client privilege and the attorney work product doctrine. Respondent also  
8 objects to this request to the extent that the request seeks the production of documents which are  
9 protected by a right of privacy.

10 Notwithstanding these objections, and without waiving same, Respondent has produced the  
11 documents identified in Schedule A.

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Dated: March 13 2009

FREEDMAN & TAITELMAN, LLP

By:   
Bryan J. Freedman  
Attorneys for Third-Party London & Co.

Schedule "A"

BOX 1

- [REDACTED] Payroll 2008 (2 FILES)
- Kate Walsh Personal Articles
- Kate Walsh [REDACTED] 2009
- Kate Walsh [REDACTED] 2007
- Kate Walsh 2008 1099'S
- Kate Walsh / [REDACTED] payroll 2008
- [REDACTED] employee file
- [REDACTED] Contracts
- Misc. Kate Walsh
- Misc. [REDACTED]
- [REDACTED]
- 2007 Kate Walsh tax return
- 2007 [REDACTED] tax return

BOX 2

- Kathleen Walsh [REDACTED] general account Jan 07- February 09
- [REDACTED] July 07- February 09
- Kathleen Walsh/Alexander Young [REDACTED] August 07- February 09
- Kathleen Walsh [REDACTED] money market account Jan 07- February 09
- Kathleen Walsh [REDACTED] pocket account Jan 07- February 09
- Alexander Young [REDACTED] pocket account August 07- December 08
- Kitty Likes to Scratch [REDACTED] Jan 07- February 09

- 1 • Kitty Likes to Scratch [REDACTED] money market account Jan 07- February 09
- 2 • Kathleen Walsh [REDACTED] stmt September 08- January 09
- 3 • [REDACTED] Jan 07- December 08
- 4 • [REDACTED] February 07- May 07, August 07- December 07, February 08-  
5 June 08, August 08- December 08
- 6 • Alexander Young [REDACTED] January 07- December 07
- 7 • Alexander Young [REDACTED] Investment Plan January 07- December 08
- 8 • Alexander Young [REDACTED] September 07- December 07, February 08, April 08-  
9 December 08
- 10 • Alexander Young [REDACTED] March 07, September 07- December 07,  
11 February 08, April 08- December 08
- 12 • Alexander Young [REDACTED] September 07- December 07, February 08- December  
13 08
- 14 • Alexander Young [REDACTED] s September 07- December 07, February 08- December  
15 08
- 16 • Alexander Young [REDACTED] September 07- December 07, February 08- December  
17 08

1 FREEDMAN & TAJTELMAN, LLP  
Bryan J. Freedman, Esq. (#151990)  
2 Jesse A. Kaplan, Esq. (#255059)  
1901 Avenue of the Stars, Suite 500  
3 Los Angeles, California 90067  
TEL: (310) 201-0005  
4 FAX: (310) 201-00045

5 Attorneys for Third-Party London & Company  
6  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10  
11 A.M. YOUNG,

12 Petitioner,

13 vs.

14 K.E. WALSH,

15 Respondent.  
16

) Case No. BD497364

)  
) **DECLARATION OF ANDREW MEYER**  
) **PURSUANT TO EVIDENCE CODE**  
) **SECTION §1561**

17  
18 I, Andrew Meyer, declare as follows:

19 1. I am the duly authorized custodian of the records produced. I have authority to  
20 certify the records.

21 2. London has produced the documents identified in Schedule A.

22 3. The documents produced are true copies of the records described in the  
23 Subpoena for Production of Business Records ("Subpoena").

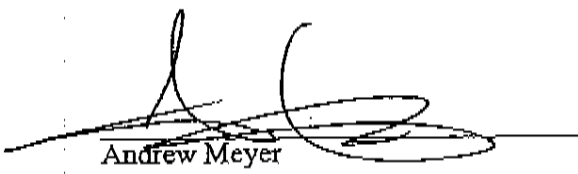
24 4. The documents were either prepared or maintained by the personnel of London in  
25 the ordinary course of business.

26 5. These document were prepared or maintained during the course of London's  
27 representation of either Alex Young or Kate Walsh.  
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6. London does not have any of the documents responsive to document Request D.

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

  
Andrew Meyer

Schedule "A"

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2  
3 BOX 1

- 4 . [REDACTED] Payroll 2008 (2 FILES)
- 5 . Kate Walsh Personal Articles
- 6 . Kate Walsh [REDACTED] 2009
- 7 . Kate Walsh [REDACTED] 2007
- 8 . Kate Walsh 2008 1099'S
- 9 . Kate Walsh [REDACTED] payroll 2008
- 10 . [REDACTED] employee file
- 11 . [REDACTED] Contracts
- 12 . Misc. Kate Walsh
- 13 . Misc [REDACTED]
- 14 . [REDACTED]
- 15 . 2007 Kate Walsh tax return
- 16 . 2007 [REDACTED] tax return

17  
18 BOX 2

- 19 . Kathleen Walsh [REDACTED] general account Jan 07- February 09
- 20 . Easy Tiger Trust [REDACTED] July 07- February 09
- 21 . Kathleen Walsh/Alexander Young [REDACTED] August 07- February 09
- 22 . Kathleen Walsh [REDACTED] money market account Jan 07- February 09
- 23 . Kathleen Walsh [REDACTED] account Jan 07- February 09
- 24 . Alexander Young [REDACTED] et account August 07- December 08
- 25 . Kitty Likes to Scratch [REDACTED] Jan 07- February 09
- 26 . Kitty Likes to Scratch [REDACTED] money market account Jan 07- February 09
- 27 . Kathleen Walsh [REDACTED] stmt September 08- January 09
- 28 . [REDACTED] Jan 07- December 08

1 [REDACTED] February 07- May 07, August 07- December 07, February 08- June  
2 08, August 08- December 08

3 Alexander Young [REDACTED] January 07- December 07

4 Alexander Young [REDACTED] Plan January 07- December 08

5 Alexander Young [REDACTED] September 07- December 07, February 08, April 08-  
6 December 08

7 Alexander Young [REDACTED] March 07, September 07- December 07,  
8 February 08, April 08- December 08

9 Alexander Young [REDACTED] September 07- December 07, February 08- December 08

10 Alexander Young [REDACTED] September 07- December 07, February 08- December 08

11 Alexander Young R [REDACTED] September 07- December 07, February 08- December 08

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1 8. On February 26, 2009, I caused a Deposition Subpoena to be issued which  
2 required the custodian of records for London & Co. to produce all of the financial documents  
3 regarding the parties from January 1, 2007 through March 18, 2009. A true and correct copy  
4 of that Deposition Subpoena is attached hereto as **Exhibit "H"** and incorporated herein.

5 A. That Deposition Subpoena was issued because Mr. Meyer and London  
6 & Co. had not provide documents and information to Mr. Young or our office when we  
7 informally requested those things.

8 B. Before serving the Deposition Subpoena on London & Co., I caused it  
9 to be served at Ms. Wasser's office with a Notice to Consumer. The Deposition Subpoena  
10 was thereafter served on London & Co. when there was no objection received from  
11 Ms. Wasser.

12 9. On March 13, 2009, we received written objections to the Deposition Subpoena  
13 to London & Co. which were signed by attorney Bryan J. Freedman. A true and correct copy  
14 of those objections is attached hereto as **Exhibit "I"** and incorporated herein. I thereafter  
15 confirmed that our deposition officer received documents from London & Co. However,  
16 London & Co. did not provide a declaration from its custodian of records.

17 10. On April 7, 2009, I sent a letter, via facsimile, to Mr. Freedman describing, in  
18 detail, why London & Co. had failed to comply with the Deposition Subpoena and why each  
19 of Mr. Freedman's written objections was inappropriate. A true and correct copy of my letter  
20 is attached hereto as **Exhibit "J"** and incorporated herein. On the sixth page of my letter,  
21 I told Mr. Freedman the following:

22 It is important that Mr. Young immediately receive all of the  
23 documents requested in the Deposition Subpoena without  
24 objection and that London & Co. provide a proper Custodian of  
25 Records affidavit or declaration. In this regard, while I am willing  
26 to consider any well reasoned and factually supported response  
27 from you, if there is no resolution of this discovery matter by  
28 5:00 p.m. on Tuesday, April 14, 2009, I will file a Motion to

1 Compel and request that London & Co. be ordered to pay all of  
2 our fees and costs as a monetary sanction.

3 11. On April 14, 2009, at approximately 4:55 p.m. - about five minutes before the  
4 deadline that I had given Mr. Freedman - our office received a letter from him which stated,  
5 essentially, that I had not met and conferred in good faith, and which suggested that I was  
6 trying to put undue pressure on London & Co. However, Mr. Freedman did not say that  
7 London & Co. would file a Motion for Protective Order or do anything else. He also did not  
8 respond to my comments about his objections. A true and correct copy of the letter that we  
9 received on April 14, 2009 is attached hereto as **Exhibit "K"** and incorporated herein.

10 12. On April 14, 2009, I sent a responsive letter, via facsimile, to Mr. Freedman.  
11 A true and correct copy of my letter is attached hereto as **Exhibit "L"** and is incorporated  
12 herein.

13 13. On April 15, 2009, I received the Declaration Of Andrew Meyer Pursuant To  
14 Evidence Code Section §1561. This declaration did not state whether London & Co. had  
15 produced all of the documents responsive to the Deposition Subpoena For Production Of  
16 Business Records or just some of the documents. A true and correct copy of the Declaration  
17 Of Andrew Meyer Pursuant To Evidence Code Section §1561 is attached hereto as **Exhibit**  
18 **"M"** and is incorporated herein.

19 14. On April 23, 2009, my office received, by mail, London & Co.'s Motion for  
20 protective order. Prior to receiving this motion, Mr. Freedman had not met and conferred at  
21 all regarding the motion for protective order.

22 15. On May 1, 2009, I caused a check in the amount of \$671.66 and a letter to be  
23 sent, via messenger, to Mr. Freedman to pay the full amount of the copying costs that he  
24 claimed that London & Co. had incurred. However, I reserved Mr. Young's right to challenge  
25 the amount of that charge. Attached hereto as **Exhibit "N"** is a true and correct copy of the  
26 May 1, 2009 letter and the check that I caused to be delivered, via messenger, to London  
27 & Co.'s attorney. [I would have caused London & Co. to be paid earlier, however, it is not  
28 clear to me that a third party is entitled to be paid for copying costs when it does not comply

KOLODNY & ANTEAU  
9100 Wilshire Boulevard - Ninth Floor, West Tower  
Beverly Hills, California 90212-3425  
(310) 271-5533 Fax (310) 271-3918

1 with a Deposition Subpoena, as London & Co. failed to comply with ours. Nevertheless, I  
2 decided to send the requested payment and reserve Mr. Young's right to contest the  
3 payment rather than unnecessarily allowing a \$671.66 copying charge to become the focus  
4 of the hearing on London & Co.'s Motion for Protective Order.]

5 16. With regard to sanctions, I request that the Court Order Mr. Meyer and London  
6 & Co. to pay \$5,825 of monetary sanctions computed as follows:

7 A. I spent approximately 2.9 hours preparing this Motion to Compel and the  
8 Separate Statement that I am causing to be filed with it. [I previously prepared a preliminary  
9 opposition and a Responsive Declaration to London & Co.'s Motion for Protective Order, and  
10 that work substantially lessened the amount of work that I had to do for this Motion].  
11 I anticipate that I will spend an additional 4 hours reviewing London & Co.'s opposition and  
12 preparing a Reply. I further anticipate that I will spend 2 hours traveling to Court, attending  
13 the hearing on the Motion, and returning to my office. Mr. Young is billed for my time at the  
14 rate of \$650 per hour. In this regard, I have been licensed as an attorney in California since  
15 1995, I am a Certified Family Law Specialist, I am a partner of Kolodny & Anteau, I am a  
16 member of the Executive Committee of the Family Law Section of the Los Angeles County  
17 Bar Association, and I have lectured at continuing legal education seminars in the past and  
18 I am scheduled to do so again in the near future.

19 B. Mr. Young will also incur a \$40 filing fee for this Motion to Compel.

20 17. I am an attorney duly licensed to practice law in all the Courts of the State of  
21 California, in good standing before the State Bar of California; I am a partner of Kolodny &  
22 Anteau, attorney of record for the Petitioner in this matter.

23 18. This Declaration is based upon facts within my own personal knowledge or  
24 from the contents of documents referred to herein.

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