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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
17

18 JOAQUIN AGUILAR MENDEZ,

Case No. BC358718

19 Plaintiff,
20 vs.

PLAINTIFF'S SEPARATE STATEMENT IN
SUPPORT OF MOTION TO COMPEL
FURTHER RESPONSES BY DEFENDANT
DIOCESE OF TEHUACAN TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES

21 CARDINAL ROGER MAHONY, THE
ROMAN CATHOLIC ARCHBISHOP OF
LOS ANGELES, A CORPORATION
22 SOLE, CARDINAL NORBERTO
RIVERA, THE DIOCESE OF
23 TEHUACAN, FATHER NICHOLAS
AGUILAR DOES 1-100,

24 Defendants.
25 _____ /

Date: August 22, 2007
Time: 8:30 a.m.
Dept: 42

FILED
LOS ANGELES SUPERIOR COURT

JUL 24 2007

John A. Clarke, Executive Officer/Clerk
By _____ Deputy

1 SEPARATE STATEMENT (SPECIAL INTERROGATORIES)

2 Plaintiffs submit this separate statement in support of the Motion to Compel the
3 Defendant DIOCESE OF TEHUACAN to respond further to the First Set of Interrogatories, in
4 compliance with California Rules of Court, Rule 335.

5
6 SPECIAL INTERROGATORY NO. 36 :

7 If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal
8 communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar, please state
9 whether there are any writings which document the subject matter of the communication(s).

10 RESPONSE:

11 The Diocese incorporates by reference its Preliminary Statement and General
12 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
13 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
14 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
15 same grounds.

16 LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:

17 The objections made to this interrogatory are too general and/or meritless and/or
18 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
19 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

20 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
21 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

22 **(a) The party to whom interrogatories have been propounded shall**
23 **respond in writing under oath separately to each interrogatory by any of**
24 **the following:**

24 (1) An answer containing the information sought to be discovered.

25 (2) An exercise of the party's option to produce writings.

26 **(3) An objection to the particular interrogatory.**

27 [Emphasis added.]

28 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

1 (b) If an objection is made to an interrogatory or to a part of an
2 interrogatory, the specific ground for the objection shall be set forth
3 clearly in the response. If an objection is based on a claim of privilege, the
4 particular privilege invoked shall be clearly stated. If an objection is based on
a claim that the information sought is protected work product under Chapter
4 (commencing with Section 2018.010), that claim shall be expressly
asserted.

5 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
6 discovery is allowed at this stage in the litigation.

7 No privileges are involved in the subject matter of the interrogatory. The "General
8 Objection" of "privilege" is too general as the Defendant does not identify any specific
9 "privilege" for this particular interrogatory, the objection is waived because no specific
10 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
11 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
12 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
13 "privileged" about the type of information sought in this discovery.

14 The objection concerning the maximum number of special interrogatories was cured
15 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
16 See Motion Exhibit "C", hereto.

17 The Court is requested to overrule all of these objections.

18 The Court is further requested to issue a monetary sanction for these frivolous, time-
19 consuming objections. There is no substantial justification for the multiplying of objections,
20 and attempting to apply them all to every interrogatory through the impermissible use of
21 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
22 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
23 this case may be sanctionable"

24
25 **SPECIAL INTERROGATORY NO. 37 :**

26 Has an officer, director, or managing agent of The Diocese of Tehuacan ever had any
27 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
28 was discussed.

1 RESPONSE:

2 The Diocese incorporates by reference its Preliminary Statement and General
3 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
4 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
5 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
6 same grounds.

7 LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:

8 The objections made to this interrogatory are too general and/or meritless and/or
9 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
10 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

11 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
12 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

13 **(a) The party to whom interrogatories have been propounded shall**
14 **respond in writing under oath separately to each interrogatory by any of**
the following:

15 (1) An answer containing the information sought to be discovered.

16 (2) An exercise of the party's option to produce writings.

17 **(3) An objection to the particular interrogatory.**

18 [Emphasis added.]

19 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

20 **(b) If an objection is made to an interrogatory or to a part of an**
21 **interrogatory, the specific ground for the objection shall be set forth**
22 **clearly in the response.** If an objection is based on a claim of privilege, the
23 particular privilege invoked shall be clearly stated. If an objection is based on
a claim that the information sought is protected work product under Chapter
4 (commencing with Section 2018.010), that claim shall be expressly
asserted.

24 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
25 discovery is allowed at this stage in the litigation.

26 No privileges are involved in the subject matter of the interrogatory. The "General
27 Objection" of "privilege" is too general as the Defendant does not identify any specific
28 "privilege" for this particular interrogatory, the objection is waived because no specific

1 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
2 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
3 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
4 "privileged" about the type of information sought in this discovery.

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6 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
7 See Motion Exhibit "C", hereto.

8 The Court is requested to overrule all of these objections.

9 The Court is further requested to issue a monetary sanction for these frivolous, time-
10 consuming objections. There is no substantial justification for the multiplying of objections,
11 and attempting to apply them all to every interrogatory through the impermissible use of
12 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
13 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
14 this case may be sanctionable"

15

16 **SPECIAL INTERROGATORY NO. 38 :**

17 If an officer, director, or managing agent of The Diocese of Tehuacan has had a conversation
18 with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed,
19 please identify each officer, director, or managing agent of The Diocese of Tehuacan who had
20 this conversation(s).

21 **RESPONSE:**

22 The Diocese incorporates by reference its Preliminary Statement and General
23 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
24 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
25 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
26 same grounds.

27 **LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:**

28 The objections made to this interrogatory are too general and/or meritless and/or

1 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
2 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

3 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
4 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

5 **(a) The party to whom interrogatories have been propounded shall**
6 **respond in writing under oath separately to each interrogatory by any of**
7 **the following:**

8 (1) An answer containing the information sought to be discovered.

9 (2) An exercise of the party's option to produce writings.

10 **(3) An objection to the particular interrogatory.**

11 [Emphasis added.]

12 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

13 **(b) If an objection is made to an interrogatory or to a part of an**
14 **interrogatory, the specific ground for the objection shall be set forth**
15 **clearly in the response.** If an objection is based on a claim of privilege, the
16 particular privilege invoked shall be clearly stated. If an objection is based on
17 a claim that the information sought is protected work product under Chapter
18 4 (commencing with Section 2018.010), that claim shall be expressly
19 asserted.

20 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
21 discovery is allowed at this stage in the litigation.

22 No privileges are involved in the subject matter of the interrogatory. The "General
23 Objection" of "privilege" is too general as the Defendant does not identify any specific
24 "privilege" for this particular interrogatory, the objection is waived because no specific
25 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
26 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
27 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
28 "privileged" about the type of information sought in this discovery.

29 The objection concerning the maximum number of special interrogatories was cured
30 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
31 See Motion Exhibit "C", hereto.

32 The Court is requested to overrule all of these objections.

1 The Court is further requested to issue a monetary sanction for these frivolous, time-
2 consuming objections. There is no substantial justification for the multiplying of objections,
3 and attempting to apply them all to every interrogatory through the impermissible use of
4 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
5 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
6 this case may be sanctionable"

7
8
9 **SPECIAL INTERROGATORY NO. 39 :**

10 If an officer, director, or managing agent of The Diocese of Tehuacan has had a conversation
11 with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed,
12 please describe the date of the conversation(s).

13 **RESPONSE:**

14 The Diocese incorporates by reference its Preliminary Statement and General
15 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
16 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
17 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
18 same grounds.

19 **LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:**

20 The objections made to this interrogatory are too general and/or meritless and/or
21 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
22 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

23 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
24 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

25 **(a) The party to whom interrogatories have been propounded shall**
26 **respond in writing under oath separately to each interrogatory by any of**
27 **the following:**

- 28 (1) An answer containing the information sought to be discovered.
(2) An exercise of the party's option to produce writings.

1 **(3) An objection to the particular interrogatory.**

2 [Emphasis added.]

3 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

4 **(b) If an objection is made to an interrogatory** or to a part of an
5 **interrogatory, the specific ground for the objection shall be set forth**
6 **clearly in the response.** If an objection is based on a claim of privilege, the
7 particular privilege invoked shall be clearly stated. If an objection is based on
8 a claim that the information sought is protected work product under Chapter
9 4 (commencing with Section 2018.010), that claim shall be expressly
10 asserted.

11 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
12 discovery is allowed at this stage in the litigation.

13 No privileges are involved in the subject matter of the interrogatory. The "General
14 Objection" of "privilege" is too general as the Defendant does not identify any specific
15 "privilege" for this particular interrogatory, the objection is waived because no specific
16 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
17 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
18 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
19 "privileged" about the type of information sought in this discovery.

20 The objection concerning the maximum number of special interrogatories was cured
21 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
22 See Motion Exhibit "C", hereto.

23 The Court is requested to overrule all of these objections.

24 The Court is further requested to issue a monetary sanction for these frivolous, time-
25 consuming objections. There is no substantial justification for the multiplying of objections,
26 and attempting to apply them all to every interrogatory through the impermissible use of
27 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
28 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
29 this case may be sanctionable"

1 SPECIAL INTERROGATORY NO. 40 :

2 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
3 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
4 was discussed, please describe the substance of the conversation.

5 RESPONSE:

6 The Diocese incorporates by reference its Preliminary Statement and General
7 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
8 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
9 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
10 same grounds.

11 LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:

12 The objections made to this interrogatory are too general and/or meritless and/or
13 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
14 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

15 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
16 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

17 **(a) The party to whom interrogatories have been propounded shall**
18 **respond in writing under oath separately to each interrogatory by any of**
19 **the following:**

20 (1) An answer containing the information sought to be discovered.

21 (2) An exercise of the party's option to produce writings.

22 **(3) An objection to the particular interrogatory.**

23 [Emphasis added.]

24 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

25 **(b) If an objection is made to an interrogatory or to a part of an**
26 **interrogatory, the specific ground for the objection shall be set forth**
27 **clearly in the response.** If an objection is based on a claim of privilege, the
particular privilege invoked shall be clearly stated. If an objection is based on
a claim that the information sought is protected work product under Chapter
4 (commencing with Section 2018.010), that claim shall be expressly
asserted.

28 The subject interrogatory is relevant to the subject matter jurisdiction issue for which

1 discovery is allowed at this stage in the litigation.

2 No privileges are involved in the subject matter of the interrogatory. The "General
3 Objection" of "privilege" is too general as the Defendant does not identify any specific
4 "privilege" for this particular interrogatory, the objection is waived because no specific
5 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
6 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
7 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
8 "privileged" about the type of information sought in this discovery.

9 The objection concerning the maximum number of special interrogatories was cured
10 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
11 See Motion Exhibit "C", hereto.

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15 and attempting to apply them all to every interrogatory through the impermissible use of
16 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
17 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
18 this case may be sanctionable"

19

20 **SPECIAL INTERROGATORY NO. 41 :**

21 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
22 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
23 was discussed, please state whether there are any writings which document the subject matter
24 of the conversation(s).

25 **RESPONSE:**

26 The Diocese incorporates by reference its Preliminary Statement and General
27 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
28 has exceeded the maximum number of special interrogatories authorized by Section 2030.030

1 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
2 same grounds.

3 LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:

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6 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

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10 **respond in writing under oath separately to each interrogatory by any of**
the following:

11 (1) An answer containing the information sought to be discovered.

12 (2) An exercise of the party's option to produce writings.

13 **(3) An objection to the particular interrogatory.**

14 [Emphasis added.]

15 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

16 **(b) If an objection is made to an interrogatory or to a part of an**
17 **interrogatory, the specific ground for the objection shall be set forth**
18 **clearly in the response.** If an objection is based on a claim of privilege, the
19 particular privilege invoked shall be clearly stated. If an objection is based on
a claim that the information sought is protected work product under Chapter
4 (commencing with Section 2018.010), that claim shall be expressly
asserted.

20 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
21 discovery is allowed at this stage in the litigation.

22 No privileges are involved in the subject matter of the interrogatory. The "General
23 Objection" of "privilege" is too general as the Defendant does not identify any specific
24 "privilege" for this particular interrogatory, the objection is waived because no specific
25 "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court*
26 (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for
27 invoking any "privilege", and the Defendant provides no explanation whatsoever for what is
28 "privileged" about the type of information sought in this discovery.

1 The objection concerning the maximum number of special interrogatories was cured
2 during the "meet and confer" process by provision of a Declaration for Additional Discovery.
3 See Motion Exhibit "C", hereto.

4 The Court is requested to overrule all of these objections.

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7 and attempting to apply them all to every interrogatory through the impermissible use of
8 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
9 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
10 this case may be sanctionable"

11
12 **SPECIAL INTERROGATORY NO. 42 :**

13 Has an officer, director, or managing agent of The Diocese of Tehuacan had any written
14 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to
15 California was discussed.

16 **RESPONSE:**

17 The Diocese incorporates by reference its Preliminary Statement and General
18 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
19 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
20 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
21 same grounds.

22 **LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:**

23 The objections made to this interrogatory are too general and/or meritless and/or
24 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
25 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

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respond in writing under oath separately to each interrogatory by any of the following:

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- (2) An exercise of the party's option to produce writings.
- (3) An objection to the particular interrogatory.**

[Emphasis added.]

Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

(b) If an objection is made to an interrogatory or to a part of an interrogatory, the specific ground for the objection shall be set forth clearly in the response. If an objection is based on a claim of privilege, the particular privilege invoked shall be clearly stated. If an objection is based on a claim that the information sought is protected work product under Chapter 4 (commencing with Section 2018.010), that claim shall be expressly asserted.

The subject interrogatory is relevant to the subject matter jurisdiction issue for which discovery is allowed at this stage in the litigation.

No privileges are involved in the subject matter of the interrogatory. The "General Objection" of "privilege" is too general as the Defendant does not identify any specific "privilege" for this particular interrogatory, the objection is waived because no specific "privilege" is timely interposed [C.C.P. § 2030.290; and *Scottsdale Ins. Co. v. Superior Court* (1997) 59 Cal.App.4th 263], the Defendant fails to establish the foundational prerequisites for invoking any "privilege", and the Defendant provides no explanation whatsoever for what is "privileged" about the type of information sought in this discovery.

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The Court is requested to overrule all of these objections.

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1 1516, noted that our courts “recognize the use of "boiler plate" objections as were provided in
2 this case may be sanctionable”

3
4 **SPECIAL INTERROGATORY NO. 43 :**

5 If an officer, director, or managing agent of The Diocese of Tehuacan has had written
6 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to
7 California was discussed, please identify each officer, director, and/or managing agent.

8 **RESPONSE:**

9 The Diocese incorporates by reference its Preliminary Statement and General
10 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
11 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
12 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
13 same grounds.

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21 **respond in writing under oath separately to each interrogatory by any of**
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26 [Emphasis added.]

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1 particular privilege invoked shall be clearly stated. If an objection is based on
2 a claim that the information sought is protected work product under Chapter
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9 "privilege" for this particular interrogatory, the objection is waived because no specific
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20 and attempting to apply them all to every interrogatory through the impermissible use of
21 "general objections". *Korea Data Systems Co. v. Superior Court* (1997) 51 Cal.App.4th 1513,
22 1516, noted that our courts "recognize the use of "boiler plate" objections as were provided in
23 this case may be sanctionable"

24 **SPECIAL INTERROGATORY NO. 44 :**

25 If an officer, director, or managing agent of The Diocese of Tehuacan has had written
26 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to
27 California was discussed, please describe the date of the communication(s).

28

1 RESPONSE:

2 The Diocese incorporates by reference its Preliminary Statement and General
3 Objections set forth above. The Diocese further objects to this Interrogatory because Plaintiff
4 has exceeded the maximum number of special interrogatories authorized by Section 2030.030
5 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the
6 same grounds.

7 LEGAL AND FACTUAL REASONS FOR COMPELLING FURTHER RESPONSE:

8 The objections made to this interrogatory are too general and/or meritless and/or
9 frivolous, warranting sanctions. The objecting party has the burden of justifying an objection
10 to an interrogatory. *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220.

11 Defendant's "General Objections" are prohibited. C.C.P. § 2030.210 requires that
12 interrogatories be responded to separately. Subdivision (a) of Section 2030.210 states:

13 **(a) The party to whom interrogatories have been propounded shall**
14 **respond in writing under oath separately to each interrogatory by any of**
the following:

15 (1) An answer containing the information sought to be discovered.

16 (2) An exercise of the party's option to produce writings.

17 **(3) An objection to the particular interrogatory.**

18 [Emphasis added.]

19 Code of Civil Procedure Section 2030.240, subdivision (b), further provides that:

20 **(b) If an objection is made to an interrogatory or to a part of an**
21 **interrogatory, the specific ground for the objection shall be set forth**
22 **clearly in the response.** If an objection is based on a claim of privilege, the
23 particular privilege invoked shall be clearly stated. If an objection is based on
a claim that the information sought is protected work product under Chapter
4 (commencing with Section 2018.010), that claim shall be expressly
asserted.

24 The subject interrogatory is relevant to the subject matter jurisdiction issue for which
25 discovery is allowed at this stage in the litigation.

26 No privileges are involved in the subject matter of the interrogatory. The "General
27 Objection" of "privilege" is too general as the Defendant does not identify any specific
28 "privilege" for this particular interrogatory, the objection is waived because no specific