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8 *Ricardo Lara, in his official capacity as Insurance*
Commissioner of the State of California, and the
9 *California Department of Insurance*

10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES
13

14 **CONSUMER WATCHDOG,**
15 **a non-profit organization,**

16 Petitioner and Plaintiff,

17 v.

18 **RICARDO LARA, in his official capacity as**
19 **the Insurance Commissioner of the State of**
20 **California; CALIFORNIA DEPARTMENT**
21 **OF INSURANCE; and DOES 1-50,**

22 Respondents and Defendants.
23

Case No. 20STCP00664

**RESPONDENTS' OBJECTIONS TO
PETITIONER'S REQUESTS FOR
ADMISSION, SET ONE**

*Assigned for all purposes to the Hon.
Mitchell L. Beckloff, Dept. 86*

Action Filed: February 18, 2020
Trial Date: Not set

24 PROPOUNDING PARTY: PETITIONER CONSUMER WATCHDOG

25 RESPONDING PARTY: RESPONDENTS RICARDO LARA, in his official capacity as the
Insurance Commissioner of the State of California; and the
26 CALIFORNIA DEPARTMENT OF INSURANCE

27 SET NO.: ONE

28 ///

1 Respondents Ricardo Lara, in his official capacity as Insurance Commissioner of the State
2 of California, and the California Department of Insurance (collectively, "the Department"), object
3 to Petitioner Consumer Watchdog's Requests for Admission, Set One, as follows:

4 **GENERAL OBJECTION**

5 The Department objects to Petitioner's Requests for Admission nos. 26 through 87 on the
6 ground that none of the requests are warranted under Section 2033.040 of the Code of Civil
7 Procedure in that the requests are being propounded for an improper purpose to harass the
8 Department, and to needlessly increase the cost of the writ petition. The greater number of
9 requests is not warranted by the complexity or the quantity of the existing and potential issues in
10 this straight-forward California Public Records Act (PRA) writ proceeding. In fact, a large
11 percentage of Petitioner's requests do not relate to individuals and/or entities identified in
12 Petitioner's PRA requests, despite Petitioner's assertion that the excess requests are necessary
13 "given the number of individual persons and entities associated with Petitioner's PRA Requests."
14 (Powell Decl., p. 2:27-28.)

15 **REQUEST FOR ADMISSION NO. 1:**

16 Admit that Respondent Ricardo Lara met with Fabian Nunez at any point from January 7,
17 2019 through and including July 23, 2019.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

19 The Department objects to this request on the ground that it seeks discovery related to
20 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
21 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
22 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
23 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
24 proceeding brought under the PRA addressing the narrow issue of whether the Department and
25 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
26 withheld records at issue in this proceeding. The Department further objects on the ground that
27 the request is harassing and meant to cause unwarranted annoyance and embarrassment.
28

1 The Department also objects to the request on the ground that it is not necessary to resolve
2 the issue of whether the Department has an obligation to disclose the redacted and withheld
3 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles v.*
4 *Superior Court* (2017) 9 Cal.App.5th 272, 288 (*City of Los Angeles*)). The determination of
5 whether the Commissioner met with Fabian Nunez is not necessary to determine whether the
6 Department has properly redacted and or withheld the records at issue here, none of which
7 involve Mr. Nunez. Nor is the discovery necessary to aid in the resolution of any issue presented
8 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
9 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

10 The Department objects to this request on the ground that it constitutes an impermissible
11 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
12 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
13 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
14 concerning Fabian Nunez.

15 The Department objects to this request on the ground that the information regarding
16 meetings with Fabian Nunez is equally available to Petitioner in that the Commissioner has
17 already disclosed to the public his calendar of meetings with external stakeholders.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 2:**

21 Admit that Respondent Ricardo Lara communicated with Fabian Nunez at any point from
22 January 7, 2019 through and including July 23, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

24 The Department objects to this request on the ground that it seeks discovery related to
25 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
26 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
27 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
28 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ

1 proceeding brought under the PRA addressing the narrow issue of whether the Department and
2 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
3 withheld records at issue in this proceeding. The Department further objects on the ground that
4 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

5 The Department also objects to the request on the ground that it is not necessary to resolve
6 the issue of whether the Department has an obligation to disclose the redacted and withheld
7 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*,
8 *supra*, 9 Cal.App.5th at p. 288.) The determination of whether the Commissioner communicated
9 with Fabian Nunez is not necessary to determine whether the Department has properly redacted
10 and or withheld the records at issue here, none of which involve Mr. Nunez. Nor is the discovery
11 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
12 has presented absolutely no evidence of bad faith in the Department's processing of the requests
13 or in its search. (*Id.* at pp. 289-290.)

14 The Department objects to this request on the ground that it constitutes an impermissible
15 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
16 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
17 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
18 concerning Fabian Nunez.

19 The Department objects on the ground that this request does not relate to persons/entities
20 identified in the PRA requests.

21 **REQUEST FOR ADMISSION NO. 3:**

22 Admit that an employee of Respondent California Department of Insurance
23 communicated with Fabian Nunez at any point from January 7, 2019 through and including July
24 23, 2019.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

26 The Department objects to this request on the ground that it seeks discovery related to
27 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
28 the subject matter involved in this writ proceeding or reasonably calculated to lead to the

1 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
2 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
3 proceeding brought under the PRA addressing the narrow issue of whether the Department and
4 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
5 withheld records at issue in this proceeding. The Department further objects on the ground that
6 the request is harassing and meant to cause unwarranted annoyance and embarrassment

7 The Department objects to the request on the ground that it is not necessary to resolve the
8 issue of whether the Department has an obligation to disclose the redacted and withheld records
9 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
10 Cal.App.5th at p. 288.) Whether a Department employee communicated with Fabian Nunez is not
11 necessary to determine whether the Department has properly redacted and or withheld the records
12 at issue here, none of which involve Fabian Nunez. Nor is the discovery necessary to aid in the
13 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
14 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
15 289-290.)

16 The Department objects to this request on the ground that it constitutes an impermissible
17 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
18 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
19 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
20 concerning Fabian Nunez.

21 The Department has close to 1400 employees. The Department objects to this request on
22 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
23 the Department to canvass all employees spread throughout the state to try and determine whether
24 any employee communicated with Fabian Nunez at any point from January 7, 2019 to July 23,
25 2019, and for the Department to verify each and every employee's response.

26 The Department objects on the ground that this request does not relate to persons/entities
27 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 4:**

2 Admit that Respondent Ricardo Lara met with Rusty Areias at any point from January 7,
3 2019 through and including July 23, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) The determination of whether the Commissioner met with Rusty Areias is
18 not necessary to determine whether the Department has properly redacted and or withheld the
19 records at issue here, none of which involve Mr. Areias. Nor is the discovery necessary to aid in
20 the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
21 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
22 (*Id.* at pp. 289-290.)

23 The Department objects to this request on the ground that it constitutes an impermissible
24 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
25 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
26 11, 2021.

27 The Department objects on the ground that this request does not relate to persons/entities
28 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 5:**

2 Admit that Respondent Ricardo Lara communicated with Rusty Areias at any point from
3 January 7, 2019 through and including July 23, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) The determination of whether the Commissioner communicated with
18 Rusty Areias is not necessary to determine whether the Department has properly redacted and or
19 withheld the records at issue here, none of which involve Mr. Areias. Nor is the discovery
20 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
21 has presented absolutely no evidence of bad faith in the Department's processing of the requests
22 or in its search. (*Id.* at pp. 289-290.)

23 The Department objects to this request on the ground that it constitutes an impermissible
24 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
25 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
26 11, 2021.

27 The Department objects on the ground that this request does not relate to persons/entities
28 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit that an employee of Respondent California Department of Insurance
3 communicated with Rusty Areias at any point from January 7, 2019 through and including July
4 23, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

6 The Department objects to this request on the ground that it seeks discovery related to
7 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
8 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
9 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
10 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
11 proceeding brought under the PRA addressing the narrow issue of whether the Department and
12 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
13 withheld records at issue in this proceeding. The Department further objects on the ground that
14 the request is harassing and meant to cause unwarranted annoyance and embarrassment

15 The Department objects to the request on the ground that it is not necessary to resolve the
16 issue of whether the Department has an obligation to disclose the redacted and withheld records
17 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
18 Cal.App.5th at p. 288.) Whether a Department employee communicated with Rusty Areias is not
19 necessary to determine whether the Department has properly redacted and or withheld the records
20 at issue here, none of which involve Mr. Areias. Nor is the discovery necessary to aid in the
21 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
22 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
23 289-290.)

24 The Department objects to this request on the ground that it constitutes an impermissible
25 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
26 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
27 11, 2021.

1 The Department has close to 1400 employees. The Department objects to this request on
2 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
3 the Department to canvass all employees spread throughout the state to try and determine whether
4 any employee communicated with Rusty Areias at any point from January 7, 2019 to July 23,
5 2019, and for the Department to verify each and every employee's response.

6 The Department objects on the ground that this request does not relate to persons/entities
7 identified in the PRA requests.

8 **REQUEST FOR ADMISSION NO. 7:**

9 Admit that Respondent Ricardo Lara met with Alan Quasha at any point from January 7,
10 2019 through and including July 23, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

12 The Department objects to this request on the ground that it seeks discovery related to
13 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
14 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
15 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
16 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
17 proceeding brought under the PRA addressing the narrow issue of whether the Department and
18 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
19 withheld records at issue in this proceeding. The Department further objects on the ground that
20 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) The determination of whether the Commissioner met with Alan Quasha is
25 not necessary to determine whether the Department has properly redacted and or withheld the
26 records at issue here, none of which involve Mr. Quasha. Nor is the discovery necessary to aid in
27 the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
28

1 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
2 (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 The Department objects on the ground that this request does not relate to persons/entities
8 identified in the PRA requests.

9 **REQUEST FOR ADMISSION NO. 8:**

10 Admit that Respondent Ricardo Lara communicated with Alan Quasha at any point from
11 January 7, 2019 through and including July 23, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

13 The Department objects to this request on the ground that it seeks discovery related to
14 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
15 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
16 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
17 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
18 proceeding brought under the PRA addressing the narrow issue of whether the Department and
19 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
20 withheld records at issue in this proceeding. The Department further objects on the ground that
21 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

22 The Department also objects to the request on the ground that it is not necessary to resolve
23 the issue of whether the Department has an obligation to disclose the redacted and withheld
24 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
25 Cal.App.5th at p. 288.) The determination of whether the Commissioner communicated with Alan
26 Quasha is not necessary to determine whether the Department has properly redacted and or
27 withheld the records at issue here, none of which involve Mr. Quasha. Nor is the discovery
28 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner

1 has presented absolutely no evidence of bad faith in the Department's processing of the requests
2 or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 The Department objects on the ground that this request does not relate to persons/entities
8 identified in the PRA requests.

9 **REQUEST FOR ADMISSION NO. 9:**

10 Admit that an employee of Respondent California Department of Insurance
11 communicated with Alan Quasha at any point from January 7, 2019 through and including July
12 23, 2019.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
19 proceeding brought under the PRA addressing the narrow issue of whether the Department and
20 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
21 withheld records at issue in this proceeding. The Department further objects on the ground that
22 the request is harassing and meant to cause unwarranted annoyance and embarrassment

23 The Department objects to the request on the ground that it is not necessary to resolve the
24 issue of whether the Department has an obligation to disclose the redacted and withheld records
25 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
26 Cal.App.5th at p. 288.) Whether a Department employee communicated with Alan Quasha is not
27 necessary to determine whether the Department has properly redacted and or withheld the records
28 at issue here, none of which involve Mr. Quasha. Nor is the discovery necessary to aid in the

1 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
2 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
3 289-290.)

4 The Department objects to this request on the ground that it constitutes an impermissible
5 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
6 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
7 11, 2021.

8 The Department has close to 1400 employees. The Department objects to this request on
9 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
10 the Department to canvass all employees spread throughout the state to try and determine whether
11 any employee communicated with Alan Quasha at any point from January 7, 2019 to July 23,
12 2019, and for the Department to verify each and every employee's response.

13 The Department objects on the ground that this request does not relate to persons/entities
14 identified in the PRA requests.

15 **REQUEST FOR ADMISSION NO. 10:**

16 Admit that Respondent Ricardo Lara met with an employee of Mercury Public Affairs
17 LLC at any point from January 7, 2019 through and including July 23, 2019.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

19 The Department objects to this request on the ground that it seeks discovery related to
20 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
21 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
22 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
23 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
24 proceeding brought under the PRA addressing the narrow issue of whether the Department and
25 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
26 withheld records at issue in this proceeding. The Department further objects on the ground that
27 the request is harassing and meant to cause unwarranted annoyance and embarrassment.
28

1 The Department also objects to the request on the ground that it is not necessary to resolve
2 the issue of whether the Department has an obligation to disclose the redacted and withheld
3 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
4 Cal.App.5th at p. 288.) The determination of whether the Commissioner met with an employee of
5 Mercury Public Affairs LLC is not necessary to determine whether the Department has properly
6 redacted and or withheld the records at issue here, none of which involve that entity. Nor is the
7 discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and
8 Petitioner has presented absolutely no evidence of bad faith in the Department's processing of the
9 requests or in its search. (*Id.* at pp. 289-290.)

10 The Department objects to this request on the ground that it constitutes an impermissible
11 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
12 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
13 11, 2021.

14 The Department objects to this request on the ground that the information regarding
15 meetings with Mercury Public Affairs LLC is equally available to Petitioner in that the
16 Commissioner has already disclosed to the public his calendar of meetings with external
17 stakeholders.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 11:**

21 Admit that Respondent Ricardo Lara communicated with an employee of Mercury Public
22 Affairs LLC at any point from January 7, 2019 through and including July 23, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 The Department objects to this request on the ground that it seeks discovery related to
25 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
26 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
27 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
28 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ

1 proceeding brought under the PRA addressing the narrow issue of whether the Department and
2 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
3 withheld records at issue in this proceeding. The Department further objects on the ground that
4 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

5 The Department also objects to the request on the ground that it is not necessary to resolve
6 the issue of whether the Department has an obligation to disclose the redacted and withheld
7 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
8 Cal.App.5th at p. 288.) The determination of whether the Commissioner communicated with an
9 employee of Mercury Public Affairs LLC is not necessary to determine whether the Department
10 has properly redacted and or withheld the records at issue here, none of which involve that entity.
11 Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
12 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
13 processing of the requests or in its search. (*Id.* at pp. 289-290.)

14 The Department objects to this request on the ground that it constitutes an impermissible
15 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
16 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
17 11, 2021.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 12:**

21 Admit that an employee of Respondent California Department of Insurance
22 communicated with an employee of Mercury Public Affairs LLC at any point from January 7,
23 2019 through and including July 23, 2019.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

25 The Department objects to this request on the ground that it seeks discovery related to
26 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
27 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
28 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's

1 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
2 proceeding brought under the PRA addressing the narrow issue of whether the Department and
3 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
4 withheld records at issue in this proceeding. The Department further objects on the ground that
5 the request is harassing and meant to cause unwarranted annoyance and embarrassment

6 The Department objects to the request on the ground that it is not necessary to resolve the
7 issue of whether the Department has an obligation to disclose the redacted and withheld records
8 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
9 Cal.App.5th at p. 288.) Whether a Department employee communicated an employee of Mercury
10 Public Affairs LLC is not necessary to determine whether the Department has properly redacted
11 and or withheld the records at issue here, none of which involve that entity. Nor is the discovery
12 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
13 has presented absolutely no evidence of bad faith in the Department's processing of the requests
14 or in its search. (*Id.* at pp. 289-290.)

15 The Department objects to this request on the ground that it constitutes an impermissible
16 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
17 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
18 11, 2021.

19 The Department has close to 1400 employees. The Department objects to this request on
20 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
21 the Department to canvass all employees spread throughout the state to try and determine whether
22 any employee communicated with an employee of Mercury Public Affairs LLC at any point from
23 January 7, 2019 to July 23, 2019, and for the Department to verify each and every employee's
24 response.

25 The Department objects on the ground that this request does not relate to persons/entities
26 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 13:**

2 Admit that Respondent Ricardo Lara met with an employee of California Strategies LLC
3 at any point from January 7, 2019 through and including July 23, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) The determination of whether the Commissioner met with an employee of
18 California Strategies LLC is not necessary to determine whether the Department has properly
19 redacted and or withheld the records at issue here, none of which involve that entity. Nor is the
20 discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and
21 Petitioner has presented absolutely no evidence of bad faith in the Department's processing of the
22 requests or in its search. (*Id.* at pp. 289-290.)

23 The Department objects to this request on the ground that it constitutes an impermissible
24 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
25 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
26 11, 2021.

27 The Department objects on the ground that this request does not relate to persons/entities
28 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 14:**

2 Admit that Respondent Ricardo Lara communicated with an employee of California
3 Strategies LLC at any point from January 7, 2019 through and including July 23, 2019.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) The determination of whether the Commissioner communicated with an
18 employee of California Strategies LLC is not necessary to determine whether the Department has
19 properly redacted and or withheld the records at issue here, none of which involve that entity. Nor
20 is the discovery necessary to aid in the resolution of any issue presented in this PRA proceeding,
21 and Petitioner has presented absolutely no evidence of bad faith in the Department's processing
22 of the requests or in its search. (*Id.* at pp. 289-290.)

23 The Department objects to this request on the ground that it constitutes an impermissible
24 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
25 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
26 11, 2021.

27 The Department objects on the ground that this request does not relate to persons/entities
28 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit that an employee of Respondent California Department of Insurance
3 communicated with an employee of California Strategies LLC at any point from January 7, 2019
4 through and including July 23, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

6 The Department objects to this request on the ground that it seeks discovery related to
7 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
8 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
9 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
10 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
11 proceeding brought under the PRA addressing the narrow issue of whether the Department and
12 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
13 withheld records at issue in this proceeding. The Department further objects on the ground that
14 the request is harassing and meant to cause unwarranted annoyance and embarrassment

15 The Department objects to the request on the ground that it is not necessary to resolve the
16 issue of whether the Department has an obligation to disclose the redacted and withheld records
17 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
18 Cal.App.5th at p. 288.) Whether a Department employee communicated with an employee of
19 California Strategies LLC is not necessary to determine whether the Department has properly
20 redacted and or withheld the records at issue here, none of which involve that entity. Nor is the
21 discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and
22 Petitioner has presented absolutely no evidence of bad faith in the Department's processing of the
23 requests or in its search. (*Id.* at pp. 289-290.)

24 The Department objects to this request on the ground that it constitutes an impermissible
25 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
26 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
27 11, 2021.

1 The Department has close to 1400 employees. The Department objects to this request on
2 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
3 the Department to canvass all employees spread throughout the state to try and determine whether
4 any employee communicated with an employee of California Strategies LLC at any point from
5 January 7, 2019 to July 23, 2019, and for the Department to verify each and every employee's
6 response.

7 The Department objects on the ground that this request does not relate to persons/entities
8 identified in the PRA requests.

9 **REQUEST FOR ADMISSION NO. 16:**

10 Admit that Respondent Ricardo Lara met with Eric Serna on or around January 30, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

12 The Department objects to this request on the ground that it seeks discovery related to
13 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
14 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
15 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
16 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
17 proceeding brought under the PRA addressing the narrow issue of whether the Department and
18 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
19 withheld records at issue in this proceeding. The Department further objects on the ground that
20 the request is harassing and meant to cause unwarranted annoyance and embarrassment

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) Whether the Commissioner met with Eric Serna on January 30, 2019, is
25 not necessary to determine whether the Department has properly redacted and withheld the
26 records at issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid in
27 the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
28

1 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
2 (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 The Department objects to this request as harassing in that the information is equally
8 available to Petitioner in that the Commissioner has already disclosed to the public his official
9 calendar of meetings with external stakeholder, including a meeting with Mr. Serna on January
10 30, 2019.

11 The Department objects on the ground that this request does not relate to persons/entities
12 identified in the PRA requests.

13 **REQUEST FOR ADMISSION NO. 17:**

14 Admit that Respondent Ricardo Lara communicated with Eric Serna regarding a meeting
15 on or around January 30, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

17 The Department objects to this request on the ground that it seeks discovery related to
18 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
19 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
20 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
21 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
22 proceeding brought under the PRA addressing the narrow issue of whether the Department and
23 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
24 withheld records at issue in this proceeding. The Department further objects on the ground that
25 the request is harassing and meant to cause unwarranted annoyance and embarrassment

26 The Department also objects to the request on the ground that it is not necessary to resolve
27 the issue of whether the Department has an obligation to disclose the redacted and withheld
28 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9

1 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Eric Serna is not
2 necessary to determine whether the Department has properly redacted and withheld the records at
3 issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid in the
4 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
5 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
6 289-290.)

7 The Department objects to this request on the ground that it constitutes an impermissible
8 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
9 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
10 11, 2021.

11 The Department objects on the ground that this request does not relate to persons/entities
12 identified in the PRA requests.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that an employee of Respondent California Department of Insurance communicated
15 with Eric Serna regarding a meeting on or around January 30, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

17 The Department objects to this request on the ground that it seeks discovery related to
18 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
19 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
20 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
21 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
22 proceeding brought under the PRA addressing the narrow issue of whether the Department and
23 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
24 withheld records at issue in this proceeding. The Department further objects on the ground that
25 the request is harassing and meant to cause unwarranted annoyance and embarrassment

26 The Department objects to the request on the ground that it is not necessary to resolve the
27 issue of whether the Department has an obligation to disclose the redacted and withheld records
28 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9

1 Cal.App.5th at p. 288.) Whether a Department employee communicated with Eric Serna is not
2 necessary to determine whether the Department has properly redacted and or withheld the records
3 at issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid in the
4 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
5 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
6 289-290.)

7 The Department objects to this request on the ground that it constitutes an impermissible
8 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
9 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
10 11, 2021.

11 The Department has close to 1400 employees. The Department objects to this request on
12 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
13 the Department to canvass all employees spread throughout the state to try and determine whether
14 any employee communicated with Erica Serna, and for the Department to verify each and every
15 employee's response.

16 The Department objects on the ground that this request does not relate to persons/entities
17 identified in the PRA requests.

18 **REQUEST FOR ADMISSION NO. 19:**

19 Admit that Respondent Ricardo Lara met with Eric Serna in Santa Fe, New Mexico on or
20 around February 26, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

22 The Department objects to this request on the ground that it seeks discovery related to
23 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
24 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
25 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
26 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
27 proceeding brought under the PRA addressing the narrow issue of whether the Department and
28 the Commissioner, in his official capacity, have an obligation to disclose the redacted and

1 withheld records at issue in this proceeding. The Department further objects on the ground that
2 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

3 The Department also objects to the request on the ground that it is not necessary to resolve
4 the issue of whether the Department has an obligation to disclose the redacted and withheld
5 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
6 Cal.App.5th at p. 288.) Whether the Commissioner met with Eric Serna on February 26, 2019 is
7 not necessary to determine whether the Department has properly redacted and or withheld the
8 records at issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid in
9 the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
10 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
11 (*Id.* at pp. 289-290.)

12 The Department objects to this request on the ground that it constitutes an impermissible
13 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
14 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
15 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
16 concerning Eric Serna.

17 The Department also objects on the ground that this request does not relate to
18 persons/entities identified in the PRA requests.

19 **REQUEST FOR ADMISSION NO. 20:**

20 Admit that Respondent Ricardo Lara communicated with Eric Serna regarding a meeting
21 on or around February 26, 2019 in Santa Fe, New Mexico.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

23 The Department objects to this request on the ground that it seeks discovery related to
24 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
25 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
26 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
27 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
28 proceeding brought under the PRA addressing the narrow issue of whether the Department and

1 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
2 withheld records at issue in this proceeding. The Department further objects on the ground that
3 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

4 The Department also objects to the request on the ground that it is not necessary to resolve
5 the issue of whether the Department has an obligation to disclose the redacted and withheld
6 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
7 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Eric Serna regarding a
8 meeting on or around February 26, 2019 is not necessary to determine whether the Department
9 has properly redacted and or withheld the records at issue here, none of which involve Mr. Serna.
10 Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
11 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
12 processing of the requests or in its search. (*Id.* at pp. 289-290.)

13 The Department objects to this request on the ground that it constitutes an impermissible
14 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
15 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
16 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
17 concerning Eric Serna.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 21:**

21 Admit that an employee of Respondent California Department of Insurance
22 communicated with Eric Serna regarding a meeting on or around February 26, 2019 in Santa Fe,
23 New Mexico.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

25 The Department objects to this request on the ground that it seeks discovery related to
26 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
27 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
28 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's

1 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
2 proceeding brought under the PRA addressing the narrow issue of whether the Department and
3 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
4 withheld records at issue in this proceeding. The Department further objects on the ground that
5 the request is harassing and meant to cause unwarranted annoyance and embarrassment

6 The Department objects to the request on the ground that it is not necessary to resolve the
7 issue of whether the Department has an obligation to disclose the redacted and withheld records
8 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
9 Cal.App.5th at p. 288.) Whether a Department employee communicated with Eric Serna
10 regarding a meeting on or around February 26, 2019, is not necessary to determine whether the
11 Department has properly redacted and or withheld the records at issue here, none of which
12 involve Mr. Serna. Nor is the discovery necessary to aid in the resolution of any issue presented
13 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
14 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

15 The Department objects to this request on the ground that it constitutes an impermissible
16 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
17 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
18 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
19 concerning Eric Serna.

20 The Department has close to 1400 employees. The Department objects to this request on
21 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
22 the Department to canvass all employees spread throughout the state to try and determine whether
23 any employee communicated with Eric Serna, and for the Department to verify each and every
24 employee's response.

25 The Department objects on the ground that this request does not relate to persons/entities
26 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 22:**

2 Admit that the photograph attached hereto as **Exhibit A** depicts a meeting between
3 Respondent Ricardo Lara and Eric Serna in Santa Fe, New Mexico on or around February 26,
4 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 The Department objects to this request on the ground that the attached photograph lacks
7 foundation, lacks authentication, and constitutes inadmissible hearsay.

8 The Department objects to this request on the ground that it seeks discovery related to
9 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
10 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
11 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
12 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
13 proceeding brought under the PRA addressing the narrow issue of whether the Department and
14 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
15 withheld records at issue in this proceeding. The Department further objects on the ground that
16 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

17 The Department also objects to the request on the ground that it is not necessary to resolve
18 the issue of whether the Department has an obligation to disclose the redacted and withheld
19 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
20 Cal.App.5th at p. 288.) Whether the Commissioner met with Eric Serna on or around February
21 26, 2019 is not necessary to determine whether the Department has properly redacted and or
22 withheld the records at issue here, none of which involve Mr. Serna. Nor is the discovery
23 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
24 has presented absolutely no evidence of bad faith in the Department's processing of the requests
25 or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
28 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February

1 11, 2021, and of the court's order sustaining the Department's objections to Petitioner's evidence
2 concerning Eric Serna.

3 The Department objects on the ground that this request does not relate to persons/entities
4 identified in the PRA requests.

5 **REQUEST FOR ADMISSION NO. 23:**

6 Admit Respondent Ricardo Lara met with Hank Nayden in Washington D.C. on or around
7 March 6, 2019.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
14 proceeding brought under the PRA addressing the narrow issue of whether the Department and
15 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
16 withheld records at issue in this proceeding. The Department further objects on the ground that
17 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

18 The Department also objects to the request on the ground that it is not necessary to resolve
19 the issue of whether the Department has an obligation to disclose the redacted and withheld
20 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
21 Cal.App.5th at p. 288.) Whether the Commissioner met with Hank Nayden on or around March 6,
22 2019 is not necessary to determine whether the Department has properly redacted and or withheld
23 the records at issue here. Nor is the discovery necessary to aid in the resolution of any issue
24 presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad
25 faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
28

1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 The Department objects on the ground that this request does not relate to persons/entities
4 identified in the PRA requests.

5 **REQUEST FOR ADMISSION NO. 24:**

6 Admit that Respondent Ricardo Lara met with Richard Solowan in Washington D.C. on or
7 around March 6, 2019.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
14 proceeding brought under the PRA addressing the narrow issue of whether the Department and
15 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
16 withheld records at issue in this proceeding. The Department further objects on the ground that
17 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

18 The Department also objects to the request on the ground that it is not necessary to resolve
19 the issue of whether the Department has an obligation to disclose the redacted and withheld
20 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
21 Cal.App.5th at p. 288.) Whether the Commissioner met with Richard Solowan on or around
22 March 6, 2019 is not necessary to determine whether the Department has properly redacted and or
23 withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any
24 issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of
25 bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
28

1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 The Department objects on the ground that this request does not relate to persons/entities
4 identified in the PRA requests.

5 **REQUEST FOR ADMISSION NO. 25:**

6 Admit that Respondent Ricardo Lara met with Bruce Byrne on or around March 15, 2019.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

8 The Department objects to this request on the ground that it seeks discovery related to
9 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
10 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
11 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
12 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
13 proceeding brought under the PRA addressing the narrow issue of whether the Department and
14 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
15 withheld records at issue in this proceeding. The Department further objects on the ground that
16 the request is harassing and meant to cause unwarranted annoyance and embarrassment

17 The Department also objects to the request on the ground that it is not necessary to resolve
18 the issue of whether the Department has an obligation to disclose the redacted and withheld
19 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
20 Cal.App.5th at p. 288.) Whether the Commissioner met with Bruce Byrne on or around March
21 15, 2019 is not necessary to determine whether the Department has properly redacted and
22 withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any
23 issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of
24 bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

25 The Department objects to this request on the ground that it constitutes an impermissible
26 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
27 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
28 11, 2021.

1 The Department also objects to this request as harassing in that the information is equally
2 available to Petitioner in that the Commissioner has already disclosed to the public his official
3 calendar of meetings with stakeholders, including a meeting with Bruce Byrne on March 15,
4 2019.

5 The Department objects on the ground that this request does not relate to persons/entities
6 identified in the PRA requests.

7 **REQUEST FOR ADMISSION NO. 26:**

8 Admit that Respondent Ricardo Lara met with an employee of Nelson Taplin Goldwater
9 Consultants in Orlando, Florida on or around April 6, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner met with an employee of Nelson Taplin
24 Goldwater Consultants on or around April 6, 2019 is not necessary to determine whether the
25 Department has properly redacted and withheld the records at issue here. Nor is the discovery
26 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
27 has presented absolutely no evidence of bad faith in the Department's processing of the requests
28 or in its search. (*Id.* at pp. 289-290.)

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 The Department objects to this request as harassing in that the information is equally
6 available to Petitioner in that the Commissioner has already disclosed to the public his official
7 calendar of meetings with external stakeholder, including a meeting with Nelson Taplin
8 Goldwater Consultants on April 6, 2019.

9 The Department objects on the ground that this request does not relate to persons/entities
10 identified in the PRA requests.

11 **REQUEST FOR ADMISSION NO. 27:**

12 Admit that Respondent Ricardo Lara met with Eric Serna in Orlando, Florida on or about
13 April 6, 2019.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
20 proceeding brought under the PRA addressing the narrow issue of whether the Department and
21 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
22 withheld records at issue in this proceeding. The Department further objects on the ground that
23 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

24 The Department also objects to the request on the ground that it is not necessary to resolve
25 the issue of whether the Department has an obligation to disclose the redacted and withheld
26 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
27 Cal.App.5th at p. 288.) Whether the Commissioner met with Eric Serna on April 6, 2019 is not
28 necessary to determine whether the Department has properly redacted and or withheld the records

1 at issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid in the
2 resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely
3 no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp.
4 289-290.)

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 The Department objects on the ground that this request does not relate to persons/entities
10 identified in the PRA requests.

11 **REQUEST FOR ADMISSION NO. 28:**

12 Admit that Respondent Ricardo Lara communicated with Eric Serna regarding a meeting
13 on or around April 6, 2019.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
20 proceeding brought under the PRA addressing the narrow issue of whether the Department and
21 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
22 withheld records at issue in this proceeding. The Department further objects on the ground that
23 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

24 The Department also objects to the request on the ground that it is not necessary to resolve
25 the issue of whether the Department has an obligation to disclose the redacted and withheld
26 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
27 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Eric Serna regarding a
28 meeting on or around April 6, 2019 is not necessary to determine whether the Department has

1 properly redacted and or withheld the records at issue here, none of which involve Mr. Serna. Nor
2 is the discovery necessary to aid in the resolution of any issue presented in this PRA proceeding,
3 and Petitioner has presented absolutely no evidence of bad faith in the Department's processing
4 of the requests or in its search. (*Id.* at pp. 289-290.)

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 The Department objects on the ground that this request does not relate to persons/entities
10 identified in the PRA requests.

11 **REQUEST FOR ADMISSION NO. 29:**

12 Admit that an employee of Respondent California Department of Insurance
13 communicated with Eric Serna regarding a meeting on or around April 6, 2019.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
20 proceeding brought under the PRA addressing the narrow issue of whether the Department and
21 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
22 withheld records at issue in this proceeding. The Department further objects on the ground that
23 the request is harassing and meant to cause unwarranted annoyance and embarrassment

24 The Department objects to the request on the ground that it is not necessary to resolve the
25 issue of whether the Department has an obligation to disclose the redacted and withheld records
26 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
27 Cal.App.5th at p. 288.) Whether a Department employee communicated with Erica Serna
28 regarding a meeting on or around April 6, 2019 is not necessary to determine whether the

1 Department has properly redacted and or withheld the records at issue here, none of which
2 involve Mr. Serna. Nor is the discovery necessary to aid in the resolution of any issue presented
3 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
4 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 The Department has close to 1400 employees. The Department objects to this request on
10 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
11 the Department to canvass all employees spread throughout the state to try and determine whether
12 any employee communicated with Eric Serna, and for the Department to verify each and every
13 employee's response.

14 The Department objects on the ground that this request does not relate to persons/entities
15 identified in the PRA requests.

16 **REQUEST FOR ADMISSION NO. 30:**

17 Admit that Respondent Ricardo Lara met with Eric Serna in New York City on or around
18 April 10, 2019.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

20 The Department objects to this request on the ground that it seeks discovery related to
21 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
22 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
23 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
24 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
25 proceeding brought under the PRA addressing the narrow issue of whether the Department and
26 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
27 withheld records at issue in this proceeding. The Department further objects on the ground that
28 the request is harassing and meant to cause unwarranted annoyance and embarrassment

1 The Department also objects to the request on the ground that it is not necessary to resolve
2 the issue of whether the Department has an obligation to disclose the redacted and withheld
3 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
4 Cal.App.5th at p. 288.) Whether the Commissioner met with Eric Serna on or around April 10,
5 2019 is not necessary to determine whether the Department has properly redacted and withheld
6 the records at issue here, none of which involve Mr. Serna. Nor is the discovery necessary to aid
7 in the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
8 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
9 (*Id.* at pp. 289-290.)

10 The Department objects to this request on the ground that it constitutes an impermissible
11 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
12 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
13 11, 2021.

14 The Department objects to this request as harassing in that the information is equally
15 available to Petitioner in that the Commissioner has already disclosed to the public his official
16 calendar of meetings with external stakeholder, including a meeting with Mr. Serna on April 10,
17 2019.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 31:**

21 Admit that Respondent Ricardo Lara communicated with Eric Serna regarding a meeting
22 in New York City on or around April 10, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

24 The Department objects to this request on the ground that it seeks discovery related to
25 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
26 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
27 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
28 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ

1 proceeding brought under the PRA addressing the narrow issue of whether the Department and
2 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
3 withheld records at issue in this proceeding. The Department further objects on the ground that
4 the request is harassing and meant to cause unwarranted annoyance and embarrassment

5 The Department also objects to the request on the ground that it is not necessary to resolve
6 the issue of whether the Department has an obligation to disclose the redacted and withheld
7 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
8 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Eric Serna regarding a
9 meeting on or around April 10, 2019 is not necessary to determine whether the Department has
10 properly redacted and withheld the records at issue here. Nor is the discovery necessary to aid in
11 the resolution of any issue presented in this PRA proceeding, and Petitioner has presented
12 absolutely no evidence of bad faith in the Department's processing of the requests or in its search.
13 (*Id.* at pp. 289-290.)

14 The Department objects to this request on the ground that it constitutes an impermissible
15 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
16 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
17 11, 2021.

18 The Department objects on the ground that this request does not relate to persons/entities
19 identified in the PRA requests.

20 **REQUEST FOR ADMISSION NO. 32:**

21 Admit that an employee of Respondent California Department of Insurance communicated
22 with Eric Serna regarding a meeting in New York City on or around April 10, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

24 The Department objects to this request on the ground that it seeks discovery related to
25 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
26 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
27 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
28 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ

1 proceeding brought under the PRA addressing the narrow issue of whether the Department and
2 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
3 withheld records at issue in this proceeding. The Department further objects on the ground that
4 the request is harassing and meant to cause unwarranted annoyance and embarrassment

5 The Department objects to the request on the ground that it is not necessary to resolve the
6 issue of whether the Department has an obligation to disclose the redacted and withheld records
7 that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
8 Cal.App.5th at p. 288.) Whether a Department employee communicated with Eric Serna
9 regarding a meeting on or around April 10, 2019 is not necessary to determine whether the
10 Department has properly redacted and or withheld the records at issue here. Nor is the discovery
11 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
12 has presented absolutely no evidence of bad faith in the Department's processing of the requests
13 or in its search. (*Id.* at pp. 289-290.)

14 The Department objects to this request on the ground that it constitutes an impermissible
15 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
16 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
17 11, 2021.

18 The Department has close to 1400 employees. The Department objects to this request on
19 the ground that it is overbroad and would be harassing, oppressive, burdensome and expensive for
20 the Department to canvass all employees spread throughout the state to try and determine whether
21 any employee communicated with Eric Serna, and for the Department to verify each and every
22 employee's response.

23 The Department objects on the ground that this request does not relate to persons/entities
24 identified in the PRA requests.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
3 Ricardo Lara never met with Steven M. Menzies.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) Whether the Commissioner met with Steven M. Menzies is not necessary
18 to determine whether the Department has properly redacted and or withheld the records at issue
19 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
20 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
21 processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has already
22 produced records related to meetings involving the Commissioner and Mr. Menzies, and provided
23 verified discovery responses that it has not withheld any records related to such meetings.
24 Requesting that the Department now respond to a request for admission (along with Form
25 Interrogatory no. 17.1) admitting that no such meetings occurred, is harassing and burdensome.

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
28

1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 34:**

4 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
5 Ricardo Lara never communicated with Steven M. Menzies.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
12 proceeding brought under the PRA addressing the narrow issue of whether the Department and
13 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
14 withheld records at issue in this proceeding. The Department further objects on the ground that
15 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

16 The Department also objects to the request on the ground that it is not necessary to resolve
17 the issue of whether the Department has an obligation to disclose the redacted and withheld
18 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
19 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Steven M. Menzies is not
20 necessary to determine whether the Department has properly redacted and or withheld the records
21 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
22 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
23 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
24 already produced records related to meetings involving the Commissioner and Mr. Menzies, and
25 provided verified discovery responses that it has not withheld any records related to such
26 meetings. Requesting that the Department now respond to a request for admission (along with
27 Form Interrogatory no. 17.1) admitting that no such communications occurred, is harassing and
28 burdensome.

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 35:**

6 Admit that between January 7, 2019 through and including July 23, 2019, employees of
7 Respondent California Department of Insurance never met with Steven M. Menzies.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
14 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
15 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
16 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
17 this proceeding. The Department further objects on the ground that the request is harassing and
18 meant to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee met with Steven M. Menzies is not
23 necessary to determine whether the Department has properly redacted and or withheld the records
24 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
25 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
26 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

27 The Department has already produced documents evidencing that a Department employee
28 met with Steven M. Menzies between January 7, 2019 and July 23, 2019, and asking it to deny

1 that such meeting occurred (and correspondingly respond to Form Interrogatory No. 17.1) is
2 harassing and burdensome and expensive. The Department has close to 1400 employees. To the
3 extent Petitioner is seeking to force the Department to canvass all 1400 employees spread
4 throughout the state to determine whether any other employee may have met with Mr. Menzies
5 (but for which meeting the Department located no responsive records) is also harassing and
6 burdensome.

7 The Department objects to this request on the ground that it constitutes an impermissible
8 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
9 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
10 11, 2021.

11 **REQUEST FOR ADMISSION NO. 36:**

12 Admit that between January 7, 2019 through and including July 23, 2019, employees of
13 Respondent California Department of Insurance never communicated with Steven M. Menzies.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
20 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
21 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
22 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
23 this proceeding. The Department further objects on the ground that the request is harassing and
24 meant to cause unwarranted annoyance and embarrassment.

25 The Department also objects to the request on the ground that it is not necessary to resolve
26 the issue of whether the Department has an obligation to disclose the redacted and withheld
27 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
28 Cal.App.5th at p. 288.) Whether any Department employee communicated with Steven M.

1 Menzies is not necessary to determine whether the Department has properly redacted and or
2 withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any
3 issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of
4 bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

5 The Department has already produced verified discovery responses that show a
6 communication between a Department employee and Steven M. Menzies between January 7,
7 2019 and July 23, 2019, and asking the Department to deny that such communication occurred
8 (and correspondingly respond to Form Interrogatory No. 17.1) is harassing and burdensome and
9 expensive. The Department has close to 1400 employees. To the extent Petitioner is seeking to
10 force the Department to canvass all 1400 employees spread throughout the state to determine
11 whether any other employee may have communicated with Mr. Menzies (but for which
12 communication the Department located no responsive records) is also harassing and burdensome.

13 The Department objects to this request to the extent it is seeking to discover the content of
14 communications withheld by the Department in response to Petitioner's PRA requests, which are
15 privileged and protected by law.

16 The Department objects to this request on the ground that it constitutes an impermissible
17 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
18 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
19 11, 2021.

20 **REQUEST FOR ADMISSION NO. 37:**

21 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
22 Ricardo Lara never met with Jeffrey A. Silver.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

24 The Department objects to this request on the ground that it seeks discovery related to
25 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
26 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
27 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
28 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ

1 proceeding brought under the PRA addressing the narrow issue of whether the Department and
2 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
3 withheld records at issue in this proceeding. The Department further objects on the ground that
4 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

5 The Department also objects to the request on the ground that it is not necessary to resolve
6 the issue of whether the Department has an obligation to disclose the redacted and withheld
7 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
8 Cal.App.5th at p. 288.) Whether the Commissioner met with Jeffrey A. Silver is not necessary to
9 determine whether the Department has properly redacted and or withheld the records at issue
10 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
11 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
12 processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has already
13 produced records related to a meeting involving the Commissioner and Jeffrey Silver, and
14 provided verified discovery responses that it has not withheld any records related to such meeting.
15 Requesting that the Department now respond to a request for admission (along with Form
16 Interrogatory no. 17.1) admitting that no such meetings occurred, is harassing and burdensome.

17 The Department objects to this request on the ground that it constitutes an impermissible
18 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
19 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
20 11, 2021.

21 **REQUEST FOR ADMISSION NO. 38:**

22 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
23 Ricardo Lara never communicated with Jeffrey A. Silver.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

25 The Department objects to this request on the ground that it seeks discovery related to
26 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
27 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
28 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's

1 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
2 proceeding brought under the PRA addressing the narrow issue of whether the Department and
3 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
4 withheld records at issue in this proceeding. The Department further objects on the ground that
5 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

6 The Department also objects to the request on the ground that it is not necessary to resolve
7 the issue of whether the Department has an obligation to disclose the redacted and withheld
8 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
9 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Jeffrey A. Silver is not
10 necessary to determine whether the Department has properly redacted and or withheld the records
11 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
12 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
13 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
14 already produced records related to a meeting involving the Commissioner and Mr. Silver, and
15 provided verified discovery responses that it has not withheld any records related to such meeting.
16 Requesting that the Department now respond to a request for admission (along with Form
17 Interrogatory no. 17.1) admitting that no such communications occurred, is harassing and
18 burdensome.

19 The Department objects to this request on the ground that it constitutes an impermissible
20 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
21 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
22 11, 2021.

23 **REQUEST FOR ADMISSION NO. 39:**

24 Admit that between January 7, 2019 through and including July 23, 2019, employees of
25 Respondent California Department of Insurance never met with Jeffrey A. Silver.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

27 The Department objects to this request on the ground that it seeks discovery related to
28 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to

1 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
2 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
3 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
4 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
5 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
6 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
7 this proceeding. The Department further objects on the ground that the request is harassing and
8 meant to cause unwarranted annoyance and embarrassment.

9 The Department also objects to the request on the ground that it is not necessary to resolve
10 the issue of whether the Department has an obligation to disclose the redacted and withheld
11 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
12 Cal.App.5th at p. 288.) Whether any Department employee met with Jeffrey A. Silver is not
13 necessary to determine whether the Department has properly redacted and or withheld the records
14 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
15 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
16 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

17 The Department has already produced documents evidencing that certain Department
18 employees met with Jeffrey A. Silver between January 7, 2019 and July 23, 2019, and asking it to
19 deny that such meetings occurred (and correspondingly respond to Form Interrogatory No. 17.1)
20 is harassing and burdensome and expensive. The Department has close to 1400 employees. To the
21 extent Petitioner is seeking to force the Department to canvass all 1400 employees spread
22 throughout the state to determine whether any other employee may have met with Mr. Silver is
23 also harassing and burdensome.

24 The Department objects to this request on the ground that it constitutes an impermissible
25 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
26 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
27 11, 2021.

1 **REQUEST FOR ADMISSION NO. 40:**

2 Admit that between January 7, 2019 through and including July 23, 2019, employees of
3 Respondent California Department of Insurance never communicated with Jeffrey A. Silver.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
10 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
11 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
12 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
13 this proceeding. The Department further objects on the ground that the request is harassing and
14 meant to cause unwarranted annoyance and embarrassment.

15 The Department also objects to the request on the ground that it is not necessary to resolve
16 the issue of whether the Department has an obligation to disclose the redacted and withheld
17 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
18 Cal.App.5th at p. 288.) Whether any Department employee communicated with Jeffrey A. Silver
19 is not necessary to determine whether the Department has properly redacted and or withheld the
20 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
21 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
22 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

23 The Department has already produced documents and verified discovery responses
24 indicating that certain Department employees communicated with Jeffrey A. Silver between
25 January 7, 2019 and July 23, 2019, and asking it to deny that such communications occurred (and
26 correspondingly respond to Form Interrogatory No. 17.1) is harassing and burdensome and
27 expensive. The Department has close to 1400 employees. To the extent Petitioner is seeking to
28 force the Department to canvass all 1400 employees spread throughout the state to determine

1 whether any other employee may have communicated with Mr. Silver is also harassing and
2 burdensome.

3 The Department objects to this request to the extent it is seeking to discover the content of
4 communications withheld by the Department in response to Petitioner's PRA requests, which are
5 privileged and protected by law.

6 The Department objects to this request on the ground that it constitutes an impermissible
7 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
8 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
9 11, 2021.

10 **REQUEST FOR ADMISSION NO. 41:**

11 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
12 Ricardo Lara never met with Stephen Acunto.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
19 proceeding brought under the PRA addressing the narrow issue of whether the Department and
20 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
21 withheld records at issue in this proceeding. The Department further objects on the ground that
22 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

23 The Department also objects to the request on the ground that it is not necessary to resolve
24 the issue of whether the Department has an obligation to disclose the redacted and withheld
25 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
26 Cal.App.5th at p. 288.) Whether the Commissioner met with Stephen Acunto is not necessary to
27 determine whether the Department has properly redacted and or withheld the records at issue
28 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA

1 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
2 processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 42:**

8 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
9 Ricardo Lara never communicated with Stephen Acunto.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Stephen Acunto is not
24 necessary to determine whether the Department has properly redacted and or withheld the records
25 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
26 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
27 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)
28

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 43:**

6 Admit that between January 7, 2019 through and including July 23, 2019, employees of
7 Respondent California Department of Insurance never met with Stephen Acunto.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
14 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
15 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
16 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
17 proceeding. The Department further objects on the ground that the request is harassing and meant
18 to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee met with Stephen Acunto is not
23 necessary to determine whether the Department has properly redacted and or withheld the records
24 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
25 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
26 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
27 close to 1400 employees. To force the Department to canvass all 1400 employees spread
28

1 throughout the state to determine whether any employee may have met with Mr. Acunto (but for
2 which meeting the Department has located no records) is also harassing and burdensome.

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 44:**

8 Admit that between January 7, 2019 through and including July 23, 2019, employees of
9 Respondent California Department of Insurance never communicated with Stephen Acunto.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
16 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
17 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
18 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
19 proceeding. The Department further objects on the ground that the request is harassing and meant
20 to cause unwarranted annoyance and embarrassment.

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) Whether any Department employee communicated with Stephen Acunto
25 is not necessary to determine whether the Department has properly redacted and or withheld the
26 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
27 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
28 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has

1 close to 1400 employees. To force the Department to canvass all 1400 employees spread
2 throughout the state to determine whether any employee may have communicated with Mr.
3 Acunto (but for which communication the Department has located no records) is also harassing
4 and burdensome.

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 **REQUEST FOR ADMISSION NO. 45:**

10 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
11 Ricardo Lara never met with Carole Acunto.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

13 The Department objects to this request on the ground that it seeks discovery related to
14 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
15 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
16 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
17 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
18 proceeding brought under the PRA addressing the narrow issue of whether the Department and
19 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
20 withheld records at issue in this proceeding. The Department further objects on the ground that
21 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

22 The Department also objects to the request on the ground that it is not necessary to resolve
23 the issue of whether the Department has an obligation to disclose the redacted and withheld
24 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
25 Cal.App.5th at p. 288.) Whether the Commissioner met with Carole Acunto is not necessary to
26 determine whether the Department has properly redacted and or withheld the records at issue
27 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
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1 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
2 processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 46:**

8 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
9 Ricardo Lara never communicated with Carole Acunto.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Carole Acunto is not
24 necessary to determine whether the Department has properly redacted and or withheld the records
25 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
26 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
27 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)
28

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 47:**

6 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
7 Ricardo Lara never met with Carl DeBarbrie.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
14 proceeding brought under the PRA addressing the narrow issue of whether the Department and
15 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
16 withheld records at issue in this proceeding. The Department further objects on the ground that
17 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

18 The Department also objects to the request on the ground that it is not necessary to resolve
19 the issue of whether the Department has an obligation to disclose the redacted and withheld
20 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
21 Cal.App.5th at p. 288.) Whether the Commissioner met with Carl DeBarbrie is not necessary to
22 determine whether the Department has properly redacted and or withheld the records at issue
23 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
24 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
25 processing of the requests or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
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1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 48:**

4 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
5 Ricardo Lara never communicated with Carl DeBarbrie.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
12 proceeding brought under the PRA addressing the narrow issue of whether the Department and
13 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
14 withheld records at issue in this proceeding. The Department further objects on the ground that
15 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

16 The Department also objects to the request on the ground that it is not necessary to resolve
17 the issue of whether the Department has an obligation to disclose the redacted and withheld
18 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
19 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Carl DeBarbrie is not
20 necessary to determine whether the Department has properly redacted and or withheld the records
21 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
22 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
23 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

24 The Department objects to this request on the ground that it constitutes an impermissible
25 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
26 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
27 11, 2021.

1 **REQUEST FOR ADMISSION NO. 49:**

2 Admit that between January 7, 2019 through and including July 23, 2019, employees of
3 Respondent California Department of Insurance never met with Carl DeBarbrie.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
10 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
11 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
12 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
13 proceeding. The Department further objects on the ground that the request is harassing and meant
14 to cause unwarranted annoyance and embarrassment.

15 The Department also objects to the request on the ground that it is not necessary to resolve
16 the issue of whether the Department has an obligation to disclose the redacted and withheld
17 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
18 Cal.App.5th at p. 288.) Whether any Department employee met with Carl DeBarbrie is not
19 necessary to determine whether the Department has properly redacted and or withheld the records
20 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
21 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
22 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
23 close to 1400 employees. To force the Department to canvass all 1400 employees spread
24 throughout the state to determine whether any employee may have met with Mr. DeBarbrie (but
25 for which meeting the Department has located no records) is also harassing and burdensome.

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
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1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 50:**

4 Admit that between January 7, 2019 through and including July 23, 2019, employees of
5 Respondent California Department of Insurance never communicated with Carl DeBarbrie.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
12 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
13 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
14 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
15 proceeding. The Department further objects on the ground that the request is harassing and meant
16 to cause unwarranted annoyance and embarrassment.

17 The Department also objects to the request on the ground that it is not necessary to resolve
18 the issue of whether the Department has an obligation to disclose the redacted and withheld
19 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
20 Cal.App.5th at p. 288.) Whether any Department employee communicated with Carl DeBarbrie is
21 not necessary to determine whether the Department has properly redacted and or withheld the
22 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
23 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
24 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
25 close to 1400 employees. To force the Department to canvass all 1400 employees spread
26 throughout the state to determine whether any employee may have communicated with Mr.
27 DeBarbrie (but for which communication the Department has located no records) is also
28 harassing and burdensome.

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 51:**

6 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
7 Ricardo Lara never met with Theresa DeBarbrie.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
14 proceeding brought under the PRA addressing the narrow issue of whether the Department and
15 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
16 withheld records at issue in this proceeding. The Department further objects on the ground that
17 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

18 The Department also objects to the request on the ground that it is not necessary to resolve
19 the issue of whether the Department has an obligation to disclose the redacted and withheld
20 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
21 Cal.App.5th at p. 288.) Whether the Commissioner met with Theresa DeBarbrie is not necessary
22 to determine whether the Department has properly redacted and or withheld the records at issue
23 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
24 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
25 processing of the requests or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
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1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 52:**

4 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
5 Ricardo Lara never communicated with Theresa DeBarbrie.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
12 proceeding brought under the PRA addressing the narrow issue of whether the Department and
13 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
14 withheld records at issue in this proceeding. The Department further objects on the ground that
15 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

16 The Department also objects to the request on the ground that it is not necessary to resolve
17 the issue of whether the Department has an obligation to disclose the redacted and withheld
18 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
19 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Theresa DeBarbrie is not
20 necessary to determine whether the Department has properly redacted and or withheld the records
21 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
22 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
23 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

24 The Department objects to this request on the ground that it constitutes an impermissible
25 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
26 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
27 11, 2021.

REQUEST FOR ADMISSION NO. 53:

Admit that between January 7, 2019 through and including July 23, 2019, Respondent Ricardo Lara never met with Sidney R. Ferenc.

RESPONSE TO REQUEST FOR ADMISSION NO. 53:

The Department objects to this request on the ground that it seeks discovery related to Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to the subject matter involved in this writ proceeding or reasonably calculated to lead to the discovery of admissible evidence. This is not a consumer finance case involving Petitioner's claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ proceeding brought under the PRA addressing the narrow issue of whether the Department and the Commissioner, in his official capacity, have an obligation to disclose the redacted and withheld records at issue in this proceeding. The Department further objects on the ground that the request is harassing and meant to cause unwarranted annoyance and embarrassment.

The Department also objects to the request on the ground that it is not necessary to resolve the issue of whether the Department has an obligation to disclose the redacted and withheld records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9 Cal.App.5th at p. 288.) Whether the Commissioner met with Sidney R. Ferenc is not necessary to determine whether the Department has properly redacted and or withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

The Department objects to this request on the ground that it constitutes an impermissible end-run around the court's May 12, 2021 order granting the Department's motion for a protective order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February 11, 2021.

1 **REQUEST FOR ADMISSION NO. 54:**

2 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
3 Ricardo Lara never communicated with Sidney R. Ferenc.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
10 proceeding brought under the PRA addressing the narrow issue of whether the Department and
11 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
12 withheld records at issue in this proceeding. The Department further objects on the ground that
13 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

14 The Department also objects to the request on the ground that it is not necessary to resolve
15 the issue of whether the Department has an obligation to disclose the redacted and withheld
16 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
17 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Sidney R. Ferenc is not
18 necessary to determine whether the Department has properly redacted and or withheld the records
19 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
20 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
21 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

22 The Department objects to this request on the ground that it constitutes an impermissible
23 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
24 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
25 11, 2021.

1 **REQUEST FOR ADMISSION NO. 55:**

2 Admit that between January 7, 2019 through and including July 23, 2019, employees of
3 Respondent California Department of Insurance never met with Sidney R. Ferenc.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

5 The Department objects to this request on the ground that it seeks discovery related to
6 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
7 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
8 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
9 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
10 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
11 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
12 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
13 proceeding. The Department further objects on the ground that the request is harassing and meant
14 to cause unwarranted annoyance and embarrassment.

15 The Department also objects to the request on the ground that it is not necessary to resolve
16 the issue of whether the Department has an obligation to disclose the redacted and withheld
17 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
18 Cal.App.5th at p. 288.) Whether any Department employee met with Sidney R. Ferenc is not
19 necessary to determine whether the Department has properly redacted and or withheld the records
20 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
21 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
22 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
23 close to 1400 employees. To force the Department to canvass all 1400 employees spread
24 throughout the state to determine whether any employee may have met with Mr. Ferenc (but for
25 which meeting the Department has located no records) is also harassing and burdensome.

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
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1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 56:**

4 Admit that between January 7, 2019 through and including July 23, 2019, employees of
5 Respondent California Department of Insurance never communicated with Sidney R. Ferenc.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
12 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
13 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
14 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
15 proceeding. The Department further objects on the ground that the request is harassing and meant
16 to cause unwarranted annoyance and embarrassment.

17 The Department also objects to the request on the ground that it is not necessary to resolve
18 the issue of whether the Department has an obligation to disclose the redacted and withheld
19 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
20 Cal.App.5th at p. 288.) Whether any Department employee communicated with Sidney R. Ferenc
21 is not necessary to determine whether the Department has properly redacted and or withheld the
22 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
23 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
24 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

25 The Department has already provided verified discovery responses indicating that a
26 Department employee communicated with Mr. Ferenc between January 7, 2019 and July 23,
27 2019, and asking it to deny that such communications occurred (and correspondingly respond to
28 Form Interrogatory No. 17.1) is harassing and burdensome and expensive. The Department has

1 close to 1400 employees. To force the Department to canvass all 1400 employees spread
2 throughout the state to determine whether any other employee may have communicated with Mr.
3 Ferenc (but for which communication the Department has located no records) is also harassing
4 and burdensome.

5 The Department objects to this request to the extent it is seeking to discover the content of
6 communications withheld by the Department in response to Petitioner's PRA requests, which are
7 privileged and protected by law.

8 The Department objects to this request on the ground that it constitutes an impermissible
9 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
10 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
11 11, 2021.

12 **REQUEST FOR ADMISSION NO. 57:**

13 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
14 Ricardo Lara never met with Jon M. McCright.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

16 The Department objects to this request on the ground that it seeks discovery related to
17 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
18 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
19 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
20 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
21 proceeding brought under the PRA addressing the narrow issue of whether the Department and
22 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
23 withheld records at issue in this proceeding. The Department further objects on the ground that
24 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

25 The Department also objects to the request on the ground that it is not necessary to resolve
26 the issue of whether the Department has an obligation to disclose the redacted and withheld
27 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
28 Cal.App.5th at p. 288.) Whether the Commissioner met with Jon M. McCright is not necessary to

1 determine whether the Department has properly redacted and or withheld the records at issue
2 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
3 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
4 processing of the requests or in its search. (*Id.* at pp. 289-290.)

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 **REQUEST FOR ADMISSION NO. 58:**

10 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
11 Ricardo Lara never communicated with Jon M. McCright.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

13 The Department objects to this request on the ground that it seeks discovery related to
14 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
15 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
16 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
17 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
18 proceeding brought under the PRA addressing the narrow issue of whether the Department and
19 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
20 withheld records at issue in this proceeding. The Department further objects on the ground that
21 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

22 The Department also objects to the request on the ground that it is not necessary to resolve
23 the issue of whether the Department has an obligation to disclose the redacted and withheld
24 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
25 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Jon M. McCright is not
26 necessary to determine whether the Department has properly redacted and or withheld the records
27 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
28

1 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
2 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 59:**

8 Admit that between January 7, 2019 through and including July 23, 2019, employees of
9 Respondent California Department of Insurance never met with Jon M. McCright.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
16 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
17 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
18 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
19 proceeding. The Department further objects on the ground that the request is harassing and meant
20 to cause unwarranted annoyance and embarrassment.

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) Whether any Department employee met with Jon M. McCright is not
25 necessary to determine whether the Department has properly redacted and or withheld the records
26 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
27 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
28 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has

1 close to 1400 employees. To force the Department to canvass all 1400 employees spread
2 throughout the state to determine whether any employee may have met with Mr. McCright (but
3 for which meeting the Department has located no records) is also harassing and burdensome.

4 The Department objects to this request on the ground that it constitutes an impermissible
5 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
6 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
7 11, 2021.

8 **REQUEST FOR ADMISSION NO. 60:**

9 Admit that between January 7, 2019 through and including July 23, 2019, employees of
10 Respondent California Department of Insurance never communicated with Jon M. McCright.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 60:**

12 The Department objects to this request on the ground that it seeks discovery related to
13 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
14 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
15 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
16 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
17 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
18 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
19 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
20 proceeding. The Department further objects on the ground that the request is harassing and meant
21 to cause unwarranted annoyance and embarrassment.

22 The Department also objects to the request on the ground that it is not necessary to resolve
23 the issue of whether the Department has an obligation to disclose the redacted and withheld
24 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
25 Cal.App.5th at p. 288.) Whether any Department employee communicated with Jon M. McCright
26 is not necessary to determine whether the Department has properly redacted and or withheld the
27 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
28 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the

1 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
2 close to 1400 employees. To force the Department to canvass all 1400 employees spread
3 throughout the state to determine whether any employee may have communicated with Mr.
4 McCright (but for which communication the Department has located no records) is also harassing
5 and burdensome.

6 The Department objects to this request on the ground that it constitutes an impermissible
7 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
8 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
9 11, 2021.

10 **REQUEST FOR ADMISSION NO. 61:**

11 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
12 Ricardo Lara never met with Marc M. Tract.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
19 proceeding brought under the PRA addressing the narrow issue of whether the Department and
20 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
21 withheld records at issue in this proceeding. The Department further objects on the ground that
22 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

23 The Department also objects to the request on the ground that it is not necessary to resolve
24 the issue of whether the Department has an obligation to disclose the redacted and withheld
25 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
26 Cal.App.5th at p. 288.) Whether the Commissioner met with Marc M. Tract is not necessary to
27 determine whether the Department has properly redacted and or withheld the records at issue
28 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA

1 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
2 processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 62:**

8 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
9 Ricardo Lara never communicated with Marc M. Tract.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Marc M. Tract is not
24 necessary to determine whether the Department has properly redacted and or withheld the records
25 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
26 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
27 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)
28

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 63:**

6 Admit that between January 7, 2019 through and including July 23, 2019, employees of
7 Respondent California Department of Insurance never met with Marc M. Tract.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
14 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
15 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
16 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
17 proceeding. The Department further objects on the ground that the request is harassing and meant
18 to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee met with Marc M. Tract is not
23 necessary to determine whether the Department has properly redacted and or withheld the records
24 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
25 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
26 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
27 close to 1400 employees. To force the Department to canvass all 1400 employees spread
28

1 throughout the state to determine whether any employee may have met with Mr. Tract (but for
2 which meeting the Department has located no records) is also harassing and burdensome.

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 64:**

8 Admit that between January 7, 2019 through and including July 23, 2019, employees of
9 Respondent California Department of Insurance never communicated with Marc M. Tract.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
16 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
17 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
18 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
19 proceeding. The Department further objects on the ground that the request is harassing and meant
20 to cause unwarranted annoyance and embarrassment.

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) Whether any Department employee communicated with Marc M. Tract is
25 not necessary to determine whether the Department has properly redacted and or withheld the
26 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
27 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
28 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has

1 close to 1400 employees. To force the Department to canvass all 1400 employees spread
2 throughout the state to determine whether any employee may have communicated with Mr. Tract
3 (but for which communication the Department has located no records) is also harassing and
4 burdensome.

5 The Department objects to this request on the ground that it constitutes an impermissible
6 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
7 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
8 11, 2021.

9 **REQUEST FOR ADMISSION NO. 65:**

10 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
11 Ricardo Lara never met with Robert L. Stafford.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

13 The Department objects to this request on the ground that it seeks discovery related to
14 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
15 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
16 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
17 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
18 proceeding brought under the PRA addressing the narrow issue of whether the Department and
19 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
20 withheld records at issue in this proceeding. The Department further objects on the ground that
21 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

22 The Department also objects to the request on the ground that it is not necessary to resolve
23 the issue of whether the Department has an obligation to disclose the redacted and withheld
24 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
25 Cal.App.5th at p. 288.) Whether the Commissioner met with Robert L. Stafford is not necessary
26 to determine whether the Department has properly redacted and or withheld the records at issue
27 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
28

1 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
2 processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 66:**

8 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
9 Ricardo Lara never communicated with Robert L. Stafford.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Robert L. Stafford is not
24 necessary to determine whether the Department has properly redacted and or withheld the records
25 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
26 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
27 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)
28

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 67:**

6 Admit that between January 7, 2019 through and including July 23, 2019, employees of
7 Respondent California Department of Insurance never met with Robert L. Stafford.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
14 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
15 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
16 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
17 this proceeding. The Department further objects on the ground that the request is harassing and
18 meant to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee met with Robert L. Stafford is not
23 necessary to determine whether the Department has properly redacted and or withheld the records
24 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
25 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
26 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
27 close to 1400 employees. To the extent Petitioner is seeking to force the Department to canvass
28 all 1400 employees spread throughout the state to determine whether any employee may have met

1 with Mr. Stafford (but for which meeting the Department located no responsive records) is also
2 harassing and burdensome.

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 68:**

8 Admit that between January 7, 2019 through and including July 23, 2019, employees of
9 Respondent California Department of Insurance never communicated with Robert L. Stafford.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes, in which Petitioner appears
16 to be attempting to implicate Department employees. Instead, this is a writ proceeding brought
17 under the PRA addressing the narrow issue of whether the Department and the Commissioner, in
18 his official capacity, have an obligation to disclose the redacted and withheld records at issue in
19 this proceeding. The Department further objects on the ground that the request is harassing and
20 meant to cause unwarranted annoyance and embarrassment.

21 The Department also objects to the request on the ground that it is not necessary to resolve
22 the issue of whether the Department has an obligation to disclose the redacted and withheld
23 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
24 Cal.App.5th at p. 288.) Whether any Department employee communicated with Robert L.
25 Stafford is not necessary to determine whether the Department has properly redacted and or
26 withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any
27 issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of
28 bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

1 The Department has already produced verified discovery responses indicating that a
2 Department employee communicated with Robert L. Stafford between January 7, 2019 and July
3 23, 2019, and asking the Department to deny that such communications occurred (and
4 correspondingly respond to Form Interrogatory No. 17.1) is harassing and burdensome and
5 expensive. The Department has close to 1400 employees. To the extent Petitioner is seeking to
6 force the Department to canvass all 1400 employees spread throughout the state to determine
7 whether any other employee may have communicated with Mr. Stafford (but for which
8 communication the Department located no responsive records) is also harassing and burdensome.

9 The Department objects to this request to the extent it is seeking to discover the content of
10 communications withheld by the Department in response to Petitioner's PRA requests, which are
11 privileged and protected by law.

12 The Department objects to this request on the ground that it constitutes an impermissible
13 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
14 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
15 11, 2021.

16 **REQUEST FOR ADMISSION NO. 69:**

17 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
18 Ricardo Lara never met with Justin N. Smith.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

20 The Department objects to this request on the ground that it seeks discovery related to
21 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
22 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
23 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
24 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
25 proceeding brought under the PRA addressing the narrow issue of whether the Department and
26 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
27 withheld records at issue in this proceeding. The Department further objects on the ground that
28 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

1 The Department also objects to the request on the ground that it is not necessary to resolve
2 the issue of whether the Department has an obligation to disclose the redacted and withheld
3 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
4 Cal.App.5th at p. 288.) Whether the Commissioner met with Justin N. Smith is not necessary to
5 determine whether the Department has properly redacted and or withheld the records at issue
6 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
7 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
8 processing of the requests or in its search. (*Id.* at pp. 289-290.)

9 The Department objects to this request on the ground that it constitutes an impermissible
10 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
11 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
12 11, 2021.

13 **REQUEST FOR ADMISSION NO. 70:**

14 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
15 Ricardo Lara never communicated with Justin N. Smith.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

17 The Department objects to this request on the ground that it seeks discovery related to
18 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
19 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
20 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
21 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
22 proceeding brought under the PRA addressing the narrow issue of whether the Department and
23 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
24 withheld records at issue in this proceeding. The Department further objects on the ground that
25 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

26 The Department also objects to the request on the ground that it is not necessary to resolve
27 the issue of whether the Department has an obligation to disclose the redacted and withheld
28 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9

1 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Justin N. Smith is not
2 necessary to determine whether the Department has properly redacted and or withheld the records
3 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
4 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
5 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

6 The Department objects to this request on the ground that it constitutes an impermissible
7 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
8 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
9 11, 2021.

10 **REQUEST FOR ADMISSION NO. 71:**

11 Admit that between January 7, 2019 through and including July 23, 2019, employees of
12 Respondent California Department of Insurance never met with Justin N. Smith.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
19 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
20 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
21 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
22 proceeding. The Department further objects on the ground that the request is harassing and meant
23 to cause unwarranted annoyance and embarrassment.

24 The Department also objects to the request on the ground that it is not necessary to resolve
25 the issue of whether the Department has an obligation to disclose the redacted and withheld
26 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
27 Cal.App.5th at p. 288.) Whether any Department employee met with Justin N. Smith is not
28 necessary to determine whether the Department has properly redacted and or withheld the records

1 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
2 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
3 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
4 close to 1400 employees. To force the Department to canvass all 1400 employees spread
5 throughout the state to determine whether any employee may have met with Mr. Smith (but for
6 which meeting the Department has located no records) is also harassing and burdensome.

7 The Department objects to this request on the ground that it constitutes an impermissible
8 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
9 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
10 11, 2021.

11 **REQUEST FOR ADMISSION NO. 72:**

12 Admit that between January 7, 2019 through and including July 23, 2019, employees of
13 Respondent California Department of Insurance never communicated with Justin N. Smith.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
20 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
21 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
22 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
23 proceeding. The Department further objects on the ground that the request is harassing and meant
24 to cause unwarranted annoyance and embarrassment.

25 The Department also objects to the request on the ground that it is not necessary to resolve
26 the issue of whether the Department has an obligation to disclose the redacted and withheld
27 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
28 Cal.App.5th at p. 288.) Whether any Department employee communicated with Justin N. Smith is

1 not necessary to determine whether the Department has properly redacted and or withheld the
2 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
3 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
4 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
5 close to 1400 employees. To force the Department to canvass all 1400 employees spread
6 throughout the state to determine whether any employee may have communicated with Mr. Smith
7 (but for which communication the Department has located no records) is also harassing and
8 burdensome.

9 The Department objects to this request on the ground that it constitutes an impermissible
10 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
11 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
12 11, 2021.

13 **REQUEST FOR ADMISSION NO. 73:**

14 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
15 Ricardo Lara never met with Darlene Graber.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

17 The Department objects to this request on the ground that it seeks discovery related to
18 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
19 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
20 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
21 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
22 proceeding brought under the PRA addressing the narrow issue of whether the Department and
23 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
24 withheld records at issue in this proceeding. The Department further objects on the ground that
25 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

26 The Department also objects to the request on the ground that it is not necessary to resolve
27 the issue of whether the Department has an obligation to disclose the redacted and withheld
28 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9

1 Cal.App.5th at p. 288.) Whether the Commissioner met with Darlene Graber is not necessary to
2 determine whether the Department has properly redacted and or withheld the records at issue
3 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
4 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
5 processing of the requests or in its search. (*Id.* at pp. 289-290.)

6 The Department objects to this request on the ground that it constitutes an impermissible
7 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
8 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
9 11, 2021.

10 **REQUEST FOR ADMISSION NO. 74:**

11 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
12 Ricardo Lara never communicated with Darlene Graber.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
19 proceeding brought under the PRA addressing the narrow issue of whether the Department and
20 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
21 withheld records at issue in this proceeding. The Department further objects on the ground that
22 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

23 The Department also objects to the request on the ground that it is not necessary to resolve
24 the issue of whether the Department has an obligation to disclose the redacted and withheld
25 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
26 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Darlene Graber is not
27 necessary to determine whether the Department has properly redacted and or withheld the records
28 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this

1 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
2 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 75:**

8 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
9 Ricardo Lara never met with Larry R. Graber.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 75:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner met with Larry R. Graber is not necessary to
24 determine whether the Department has properly redacted and or withheld the records at issue
25 here. Nor is the discovery necessary to aid in the resolution of any issue presented in this PRA
26 proceeding, and Petitioner has presented absolutely no evidence of bad faith in the Department's
27 processing of the requests or in its search. (*Id.* at pp. 289-290.)

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 76:**

6 Admit that between January 7, 2019 through and including July 23, 2019, Respondent
7 Ricardo Lara never communicated with Larry R. Graber.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
14 proceeding brought under the PRA addressing the narrow issue of whether the Department and
15 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
16 withheld records at issue in this proceeding. The Department further objects on the ground that
17 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

18 The Department also objects to the request on the ground that it is not necessary to resolve
19 the issue of whether the Department has an obligation to disclose the redacted and withheld
20 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
21 Cal.App.5th at p. 288.) Whether the Commissioner communicated with Larry R. Graber is not
22 necessary to determine whether the Department has properly redacted and or withheld the records
23 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
24 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
25 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

26 The Department objects to this request on the ground that it constitutes an impermissible
27 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
28

1 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
2 11, 2021.

3 **REQUEST FOR ADMISSION NO. 77:**

4 Admit that between January 7, 2019 through and including July 23, 2019, employees of
5 Respondent California Department of Insurance never met with Larry R. Graber.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 77:**

7 The Department objects to this request on the ground that it seeks discovery related to
8 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
9 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
10 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
11 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
12 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
13 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
14 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
15 proceeding. The Department further objects on the ground that the request is harassing and meant
16 to cause unwarranted annoyance and embarrassment.

17 The Department also objects to the request on the ground that it is not necessary to resolve
18 the issue of whether the Department has an obligation to disclose the redacted and withheld
19 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
20 Cal.App.5th at p. 288.) Whether any Department employee met with Larry R. Graber is not
21 necessary to determine whether the Department has properly redacted and or withheld the records
22 at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented in this
23 PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
24 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
25 close to 1400 employees. To force the Department to canvass all 1400 employees spread
26 throughout the state to determine whether any employee may have met with Mr. Graber (but for
27 which meeting the Department has located no records) is also harassing and burdensome.

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 **REQUEST FOR ADMISSION NO. 78:**

6 Admit that between January 7, 2019 through and including July 23, 2019, employees of
7 Respondent California Department of Insurance never communicated with Larry R. Graber.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 78:**

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner's claims of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
13 claims of alleged violation of bribery and money-laundering statutes in which the Petitioner is
14 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
15 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
16 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
17 proceeding. The Department further objects on the ground that the request is harassing and meant
18 to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee communicated with Larry R. Graber
23 is not necessary to determine whether the Department has properly redacted and or withheld the
24 records at issue here. Nor is the discovery necessary to aid in the resolution of any issue presented
25 in this PRA proceeding, and Petitioner has presented absolutely no evidence of bad faith in the
26 Department's processing of the requests or in its search. (*Id.* at pp. 289-290.) The Department has
27 close to 1400 employees. To force the Department to canvass all 1400 employees spread
28 throughout the state to determine whether any employee may have communicated with Mr.

1 Graber (but for which communication the Department has located no records) is also harassing
2 and burdensome.

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021.

7 **REQUEST FOR ADMISSION NO. 79:**

8 Admit that Respondent Ricardo Lara was aware that Eric Serna represented Applied
9 Underwriters, Inc.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 79:**

11 The Department objects to this request on the ground that it seeks discovery related to
12 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
13 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
14 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
15 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
16 proceeding brought under the PRA addressing the narrow issue of whether the Department and
17 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
18 withheld records at issue in this proceeding. The Department further objects on the ground that
19 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

20 The Department also objects to the request on the ground that it is not necessary to resolve
21 the issue of whether the Department has an obligation to disclose the redacted and withheld
22 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
23 Cal.App.5th at p. 288.) Whether the Commissioner was aware that Eric Serna represented
24 Applied Underwriters, Inc., as Petitioner claims, is not necessary to determine whether the
25 Department has properly redacted and withheld the records at issue here. Nor is the discovery
26 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
27 has presented absolutely no evidence of bad faith in the Department's processing of the requests
28 or in its search. (*Id.* at pp. 289-290.)

1 The Department objects to this request on the ground that it constitutes an impermissible
2 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
3 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
4 11, 2021.

5 The Department objects on the ground that this request does not relate to persons/entities
6 identified in the PRA requests.

7 **REQUEST FOR ADMISSION NO. 80:**

8 Admit that Respondent California Department of Insurance was aware that Eric Serna
9 represented Applied Underwriters, Inc.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

11 The Department objects to the terms "California Department of Insurance" as overbroad
12 and vague and ambiguous in the context of this request. The Department is a public entity, and
13 incapable of independent knowledge or awareness. To that end, the Department interprets this
14 request to mean the Department's employees.

15 The Department objects to this request on the ground that it seeks discovery related to
16 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
17 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
18 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
19 claims of alleged violation of bribery and money-laundering statutes in which Petitioner is
20 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
21 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
22 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
23 proceeding. The Department further objects on the ground that the request is harassing and meant
24 to cause unwarranted annoyance and embarrassment.

25 The Department also objects to the request on the ground that it is not necessary to resolve
26 the issue of whether the Department has an obligation to disclose the redacted and withheld
27 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
28 Cal.App.5th at p. 288.) Whether any Department employee was aware that Eric Serna represented

1 Applied Underwriters, Inc., as Petitioner claims, is not necessary to determine whether the
2 Department has properly redacted and withheld the records at issue here. Nor is the discovery
3 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
4 has presented absolutely no evidence of bad faith in the Department's processing of the requests
5 or in its search. (*Id.* at pp. 289-290.) Further, to force the Department to canvass all of its nearly
6 1400 employees to determine whether any employee may have known that Eric Serna allegedly
7 represented Applied Underwriters, Inc. is harassing and burdensome.

8 The Department objects to this request on the ground that it constitutes an impermissible
9 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
10 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
11 11, 2021.

12 The Department objects on the ground that this request does not relate to persons/entities
13 identified in the PRA requests.

14 **REQUEST FOR ADMISSION NO. 81:**

15 Admit that Respondent Ricardo Lara was aware that Fabian Nunez represented Applied
16 Underwriters, Inc.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 81:**

18 The Department objects to this request on the ground that it seeks discovery related to
19 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
20 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
21 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
22 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
23 proceeding brought under the PRA addressing the narrow issue of whether the Department and
24 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
25 withheld records at issue in this proceeding. The Department further objects on the ground that
26 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

27 The Department also objects to the request on the ground that it is not necessary to resolve
28 the issue of whether the Department has an obligation to disclose the redacted and withheld

1 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
2 Cal.App.5th at p. 288.) Whether the Commissioner was aware that Fabian Nunez represented
3 Applied Underwriters, Inc., as Petitioner claims, is not necessary to determine whether the
4 Department has properly redacted and withheld the records at issue here. Nor is the discovery
5 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
6 has presented absolutely no evidence of bad faith in the Department's processing of the requests
7 or in its search. (*Id.* at pp. 289-290.)

8 The Department objects to this request on the ground that it constitutes an impermissible
9 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
10 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
11 11, 2021, and the court's sustaining of the Department's objections concerning Petitioner's
12 evidence regarding Fabian Nunez.

13 The Department objects on the ground that this request does not relate to persons/entities
14 identified in the PRA requests.

15 **REQUEST FOR ADMISSION NO. 82:**

16 Admit that Respondent California Department of Insurance was aware that Fabian Nunez
17 represented Applied Underwriters, Inc.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 82:**

19 The Department objects to the terms "California Department of Insurance" as overbroad
20 and vague and ambiguous in the context of this request. The Department is a public entity, and
21 incapable of independent knowledge or awareness. To that end, the Department interprets this
22 request to mean the Department's employees.

23 The Department objects to this request on the ground that it seeks discovery related to
24 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
25 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
26 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
27 claims of alleged violation of bribery and money-laundering statutes in which Petitioner is
28 attempting to implicate Department employees. Instead, this is a writ proceeding brought under

1 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
2 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
3 proceeding. The Department further objects on the ground that the request is harassing and meant
4 to cause unwarranted annoyance and embarrassment.

5 The Department also objects to the request on the ground that it is not necessary to resolve
6 the issue of whether the Department has an obligation to disclose the redacted and withheld
7 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
8 Cal.App.5th at p. 288.) Whether any Department employee was aware that Fabian Nunez
9 represented Applied Underwriters, Inc., as Petitioner claims, is not necessary to determine
10 whether the Department has properly redacted and withheld the records at issue here. Nor is the
11 discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and
12 Petitioner has presented absolutely no evidence of bad faith in the Department's processing of the
13 requests or in its search. (*Id.* at pp. 289-290.) Further, to force the Department to canvass all of its
14 nearly 1400 employees to determine whether any employee may have known that Fabian Nunez
15 allegedly represented Applied Underwriters, Inc. is harassing and burdensome.

16 The Department objects to this request on the ground that it constitutes an impermissible
17 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
18 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
19 11, 2021, and the court's sustaining of the Department's objections concerning Petitioner's
20 evidence regarding Fabian Nunez.

21 The Department objects on the ground that this request does not relate to persons/entities
22 identified in the PRA requests.

23 **REQUEST FOR ADMISSION NO. 83:**

24 Admit that Respondent Ricardo Lara was aware that Fabian Nunez represented California
25 Insurance Company.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 83:**

27 The Department objects to this request on the ground that it seeks discovery related to
28 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to

1 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
2 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
3 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
4 proceeding brought under the PRA addressing the narrow issue of whether the Department and
5 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
6 withheld records at issue in this proceeding. The Department further objects on the ground that
7 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

8 The Department also objects to the request on the ground that it is not necessary to resolve
9 the issue of whether the Department has an obligation to disclose the redacted and withheld
10 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
11 Cal.App.5th at p. 288.) Whether the Commissioner was aware that Fabian Nunez represented
12 California Insurance Company as Petitioner claims, is not necessary to determine whether the
13 Department has properly redacted and withheld the records at issue here. Nor is the discovery
14 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
15 has presented absolutely no evidence of bad faith in the Department's processing of the requests
16 or in its search. (*Id.* at pp. 289-290.)

17 The Department objects to this request on the ground that it constitutes an impermissible
18 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
19 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
20 11, 2021, and the court's sustaining of the Department's objections concerning Petitioner's
21 evidence regarding Fabian Nunez.

22 The Department objects on the ground that this request does not relate to persons/entities
23 identified in the PRA requests.

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1 **REQUEST FOR ADMISSION NO. 84:**

2 Admit that Respondent California Department of Insurance was aware that Fabian Nunez
3 represented California Insurance Company.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 84:**

5 The Department objects to the terms “California Department of Insurance” as overbroad
6 and vague and ambiguous in the context of this request. The Department is a public entity, and
7 incapable of independent knowledge or awareness. To that end, the Department interprets this
8 request to mean the Department’s employees.

9 The Department objects to this request on the ground that it seeks discovery related to
10 Petitioner’s claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
11 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
12 discovery of admissible evidence. This is not a consumer finance case involving Petitioner’s
13 claims of alleged violation of bribery and money-laundering statutes in which Petitioner is
14 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
15 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
16 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
17 proceeding. The Department further objects on the ground that the request is harassing and meant
18 to cause unwarranted annoyance and embarrassment.

19 The Department also objects to the request on the ground that it is not necessary to resolve
20 the issue of whether the Department has an obligation to disclose the redacted and withheld
21 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
22 Cal.App.5th at p. 288.) Whether any Department employee was aware that Fabian Nunez
23 represented California Insurance Company as Petitioner claims, is not necessary to determine
24 whether the Department has properly redacted and withheld the records at issue here. Nor is the
25 discovery necessary to aid in the resolution of any issue presented in this PRA proceeding, and
26 Petitioner has presented absolutely no evidence of bad faith in the Department’s processing of the
27 requests or in its search. (*Id.* at pp. 289-290.) Further, to force the Department to canvass all of its
28

1 nearly 1400 employees to determine whether any employee may have known that Fabian Nunez
2 allegedly represented California Insurance Company is harassing and burdensome.

3 The Department objects to this request on the ground that it constitutes an impermissible
4 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
5 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
6 11, 2021, and the court's sustaining of the Department's objections concerning Petitioner's
7 evidence regarding Fabian Nunez.

8 The Department objects on the ground that this request does not relate to persons/entities
9 identified in the PRA requests.

10 **REQUEST FOR ADMISSION NO. 85:**

11 Admit that Respondent Ricardo Lara was aware that Eric Serna represented Independence
12 Holding Company.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 85:**

14 The Department objects to this request on the ground that it seeks discovery related to
15 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
16 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
17 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
18 claims of alleged violation of bribery and money-laundering statutes. Instead, this is a writ
19 proceeding brought under the PRA addressing the narrow issue of whether the Department and
20 the Commissioner, in his official capacity, have an obligation to disclose the redacted and
21 withheld records at issue in this proceeding. The Department further objects on the ground that
22 the request is harassing and meant to cause unwarranted annoyance and embarrassment.

23 The Department also objects to the request on the ground that it is not necessary to resolve
24 the issue of whether the Department has an obligation to disclose the redacted and withheld
25 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
26 Cal.App.5th at p. 288.) Whether the Commissioner was aware that Eric Serna represented
27 Independence Holding Company as Petitioner claims, is not necessary to determine whether the
28 Department has properly redacted and withheld the records at issue here. Nor is the discovery

1 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
2 has presented absolutely no evidence of bad faith in the Department's processing of the requests
3 or in its search. (*Id.* at pp. 289-290.)

4 The Department objects to this request on the ground that it constitutes an impermissible
5 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
6 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
7 11, 2021.

8 The Department objects on the ground that this request does not relate to persons/entities
9 identified in the PRA requests.

10 **REQUEST FOR ADMISSION NO. 86:**

11 Admit that Respondent California Department of Insurance was aware that Eric Serna
12 represented Independence Holding Company.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 86:**

14 The Department objects to the terms "California Department of Insurance" as overbroad
15 and vague and ambiguous in the context of this request. The Department is a public entity, and
16 incapable of independent knowledge or awareness. To that end, the Department interprets this
17 request to mean the Department's employees.

18 The Department objects to this request on the ground that it seeks discovery related to
19 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
20 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
21 discovery of admissible evidence. This is not a consumer finance case involving Petitioner's
22 claims of alleged violation of bribery and money-laundering statutes in which Petitioner is
23 attempting to implicate Department employees. Instead, this is a writ proceeding brought under
24 the PRA addressing the narrow issue of whether the Department and the Commissioner, in his
25 official capacity, have an obligation to disclose the redacted and withheld records at issue in this
26 proceeding. The Department further objects on the ground that the request is harassing and meant
27 to cause unwarranted annoyance and embarrassment.

1 The Department also objects to the request on the ground that it is not necessary to resolve
2 the issue of whether the Department has an obligation to disclose the redacted and withheld
3 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
4 Cal.App.5th at p. 288.) Whether any Department employee was aware that Eric Serna represented
5 Independence Holding Company as Petitioner claims, is not necessary to determine whether the
6 Department has properly redacted and withheld the records at issue here. Nor is the discovery
7 necessary to aid in the resolution of any issue presented in this PRA proceeding, and Petitioner
8 has presented absolutely no evidence of bad faith in the Department's processing of the requests
9 or in its search. (*Id.* at pp. 289-290.) Further, to force the Department to canvass all of its nearly
10 1400 employees to determine whether any employee may have known that Eric Serna allegedly
11 represented Independence Holding Company is harassing and burdensome.

12 The Department objects to this request on the ground that it constitutes an impermissible
13 end-run around the court's May 12, 2021 order granting the Department's motion for a protective
14 order as to Petitioner's Notice of Deposition of Persons Most Knowledgeable served on February
15 11, 2021.

16 The Department also objects on the ground that this request does not relate to
17 persons/entities identified in the PRA requests.

18 **REQUEST FOR ADMISSION NO. 87:**

19 Admit that between January 7, 2019 and July 23, 2019, Respondent Ricardo Lara was
20 acting as Treasurer for the Ricardo Lara for Insurance Commissioner 2022 campaign.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 87:**

22 The Department objects to this request on the ground that it seeks discovery related to
23 Petitioner's claim of alleged wrongdoing on the part of the Commissioner, and is not relevant to
24 the subject matter involved in this writ proceeding or reasonably calculated to lead to the
25 discovery of admissible evidence. This is not a case involving Petitioner's claims associated with
26 the Commissioner's campaign contributions. Instead, this is a writ proceeding brought under the
27 PRA addressing the narrow issue of whether the Department and the Commissioner, in his
28 official capacity, have an obligation to disclose the redacted and withheld records at issue in this

1 proceeding. The Department further objects on the ground that the discovery is harassing and
2 meant to cause unwarranted annoyance and embarrassment.

3 The Department also objects to the request on the ground that it is not necessary to resolve
4 the issue of whether the Department has an obligation to disclose the redacted and withheld
5 records that are the subject of this proceeding and is therefore irrelevant. (*City of Los Angeles*, 9
6 Cal.App.5th at p. 288.) Discovery as to whether the Commissioner was acting as treasure for his
7 2022 campaign is not necessary to determine whether the Department has properly redacted and
8 withheld the records at issue here. Nor is the discovery necessary to aid in the resolution of any
9 issue presented in this PRA proceeding, and Petitioner has presented absolutely no evidence of
10 bad faith in the Department's processing of the requests or in its search. (*Id.* at pp. 289-290.)

11 Dated: July 19, 2021

Respectfully Submitted,

12 ROB BONTA
13 Attorney General of California
14 MOLLY K. MOSLEY
15 Supervising Deputy Attorney General

16 

17 DEBBIE J. VOROUS
18 Deputy Attorney General
19 *Attorneys for Respondents and Defendants*
20 *Ricardo Lara, in his official capacity as*
21 *Insurance Commissioner of the State of*
22 *California, and the California Department*
23 *of Insurance*

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PROOF OF SERVICE BY E-MAIL AND U.S. MAIL

Case Name: **Consumer Watchdog v. Lara, et al.**
Case No.: **20STCP00664**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On July 19, 2021, I served the attached:

**• RESPONDENTS' OBJECTIONS TO PETITIONER'S REQUESTS FOR
ADMISSION, SET ONE**

by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

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I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on July 19, 2021, at Sacramento, California.

M. Garcia
Declarant


Signature