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3 Pro Se
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5 SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 COUNTY OF SANTA CLARA, SMALL CLAIMS DIVISION
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8 Mark Klein,) Case No. 2-04-SC-001150
9 Plaintiff,)
vs.) **KLEIN'S FIRST SET OF**
10 Eric Wilson,) **INTERROGATORIES**
11 Defendant)
12)
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18 PROPOUNDING PARTY: Mark Klein
19 RESPONDING PARTY: Eric Wilson
20 SET NUMBER: One
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1 Pursuant to Sections 2019 and 2030 of the California Code of
2 Civil Procedure, Mark Klein hereby propounds its First Set of
3 Interrogatories upon Eric Wilson, to be answered fully in
4 writing and under oath and in accordance with the definitions
5 and instructions below. Such interrogatory responses will be
6 required to be produced pursuant to California Code of Civil
7 Procedure § 2030(h), within 30 calendar days after service of
8 these requests, at the home of Mark Klein, 1192 St. Anthony Ct.,
9 Los Altos, CA 94024.

10 **DEFINITIONS AND INSTRUCTIONS**

11 1. The terms "you" and "your" and "defendant" shall mean
12 Eric Wilson.

13 2. The terms "person" and "persons" shall mean and includes
14 any natural person, firm, association, partnership, joint
15 venture, corporation, estate, trust, receiver, syndicate,
16 municipal corporation, and any other form of legal entity or
17 other group or combination acting as a unit.

18 3. The terms "document" and "documents" are synonymous in
19 meaning and equal in scope to the usage of the terms as defined
20 by 16 C.F.R. § 3.34(b), and includes, without limitation, any
21 written material, whether typed, handwritten, printed or
22 otherwise, and whether in draft or final form, of any kind or
23 nature, or any photograph, photostat, microfilm or other
24 reproduction thereof, including, without limitation, each note,
25 memorandum, letter, telegram, telex, circular, release, article,

1 report, prospectus, memorandum of any telephone or in-person
2 conversation, any financial statement, analysis, drawing, graph,
3 chart, account, book, notebook, draft, summary, diary,
4 transcript, computer data base, computer printout or other
5 computer generated matter, contract or order, technical report,
6 laboratory report or notebook, engineering report, patent,
7 registration or mark, application for a copyright, trademark or
8 patent, patent appraisal, infringement search or study, and all
9 mechanical and electronic audio and video recordings or
10 transcripts thereof, and other data compilations from which
11 information can be obtained and translated; if necessary, by
12 Defendant/Counter-Plaintiffs into reasonably usable form.

13 Electronic mail is included within the definition of the terms
14 "document" or "documents." A draft or-non-identical copy is a
15 separate document within the meaning of the term.

16 4. The term "identify" shall mean:

17 a. when used in reference to an individual person, to
18 state (a) his or her full name, address and present phone
19 number, and (b) his or her relationship with defendant;

20 b. when used in reference to a person other than an
21 individual, such as a corporation, partnership, etc., to state
22 its official name, its organizational form and its address; and

23 c. when used in reference to a document, to state the
24 identification number of the document (if it is being produced
25 or has already been produced), or state (a) the date of the

1 document; (b) the author and signatory of the document; (c) the
2 type of document (e.g., letter, memorandum, agreement, etc.);
3 and (d) the custodian and location of the document.

4 5. The term "relating" (or "relate") shall mean: pertaining,
5 describing, referring, evidencing, reflecting, discussing,
6 showing, supporting, contradicting, refuting, constituting,
7 embodying, containing, concerning, identifying, or in any way
8 logically or factually connected with the matter discussed.

9 6. The term "describe" shall mean to detail in full, with
10 specificity, the event or situation at issue.

11 7. The words "or" and "and" shall be read in the conjunctive
12 and not in the disjunctive wherever they appear, and neither of
13 these words shall be interpreted to limit the scope of a
14 request. The use of a verb in any tense shall be construed as
15 the use of the verb in all other tenses and the singular form
16 shall be deemed to include the plural, and vice-versa. The
17 singular form of any noun shall be deemed to include the plural,
18 and vice-versa.

19 8. The present tense includes the past and future tenses.
20 The singular includes the plural, and the plural includes the
21 singular. "All" means "any and all"; "any" means "any and all."
22 "Including" means "including but not limited to." "And" and "or"
23 encompass both "and" and "or." Words in the masculine, feminine
24 or neuter form shall include each of the other genders.

1 telephone number of every person who participated in the
2 preparation, factual investigation and/or drafting of your
3 responses to these interrogatories or who otherwise provided
4 information responsive to these interrogatories.

5 **Interrogatory No. 2:**

6 State your gross income and expenses, net income or
7 deficit, net worth and total indebtedness for each year since
8 1999.

9 **Interrogatory No. 3:**

10 Identify all businesses you have participated in, as an
11 employee, owner, or adviser, in since 1999.

12 **Interrogatory No. 4:**

13 State your Social Security number.

14 **Interrogatory No. 5:**

15 State your Driver's license number.

16 **Interrogatory No. 6:**

17 Identify the name (including maiden name), address, and
18 telephone number of your spouse and of all your former spouses.

19 **Interrogatory No. 7:**

20 Describe all your and your spouse's sources of income.

21 **Interrogatory No. 8:**

22 Describe all your and your spouse's expenses, financial
23 obligations, and liabilities.

24 **Interrogatory No. 9:**

25 State the address of your primary residence.

1 **Interrogatory No. 10:**

2 State the address of all real property owned, rented, or
3 leased by you or your spouse. State whether each property is
4 owned, rented, or leased and by whom.

5 **Interrogatory No. 11:**

6 State the location and box number of all safe deposit boxes
7 to which you or your spouse have the right to access.

8 **Interrogatory No. 12:**

9 Identify the financial institution(s) where you or your
10 spouse have deposit, savings, checking, or other accounts. For
11 each account, identify the type and state the balance.

12 **Interrogatory No. 13:**

13 State the location and account numbers of all accounts for
14 which you have the power to sign checks, or other instruments,
15 for the payment of money.

16 **Interrogatory No. 14:**

17 State the location of all boats, automobiles, or other
18 motor vehicles available for you or your spouse to use. State
19 whether each vehicle is owned or leased and by whom.

20 **Interrogatory No. 15:**

21 State the location and value of all stock, bonds,
22 promissory notes, drafts, bills of exchange, commercial paper,
23 and other financial instruments owned by you or your spouse.

24 **Interrogatory No. 16:**

1 State the location, description, and value of all jewelry
2 and antiques owned by you or your spouse.

3 **Interrogatory No. 17:**

4 Describe your divorce and alimony agreements. Identify all
5 agreement documents relating to your divorce.

6 **Interrogatory No. 18:**

7 Describe the transfer of any of your or your spouse's
8 property which has taken place within the past three years.

9 **Interrogatory No. 19:**

10 Identify all your and your spouse's creditors and the
11 amounts owed.

12 **Interrogatory No. 20:**

13 Identify all your and your spouse's debtors and the amounts
14 owed.

15 **Interrogatory No. 21:**

16 Identify all trusts in which you or your spouse are a
17 trustee or custodian.

18 **Interrogatory No. 22:**

19 Identify your accountant or CPA.

20 **Interrogatory No. 23:**

21 Describe all judgments of record against you.

22 **Interrogatory No. 24:**

23 Describe all legal proceedings in which you were named as a
24 plaintiff or defendant within the past five years. For each
25 case, state the name of the court and the case number.

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Dated: September 20, 2004

Respectfully Submitted,

Mark Klein
Plaintiff