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6 Attorneys for Petitioner,
DIANNE YORK GOLDMAN

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SAN DIEGO-NORTH COUNTY DIVISION

11 In re the MARRIAGE of:

12 Petitioner: DIANNE YORK GOLDMAN,

13 And

14 Respondent: MITCHEL PAUL GOLDMAN.

Case No. DN149413

AMENDED NOTICE OF TAKING
DEPOSITION OF RESPONDENT, MITCHEL
PAUL GOLDMAN
(CCP § 2025.010 et seq.)

DATE: August 26, 2019

TIME: 10:00 A.M.

PLACE: Gordon D. Cruse, APLC
402 West Broadway, Suite 1210
San Diego, CA 92101

18 TO RESPONDENT, MITCHEL PAUL GOLDMAN, AND HIS ATTORNEY OF
19 RECORD:

20 NOTICE IS HEREBY GIVEN that on August 26, 2019 at 10:00 a.m., pursuant to *Code of Civil*
21 *Procedure Section 2025.010 et seq.*, at Gordon D. Cruse, APLC, located at 402 West Broadway, Suite 1210,
22 San Diego, CA 92101, Petitioner's counsel will take the oral deposition of Respondent, Mitchel Paul
23 Goldman.

24 This deposition shall be recorded stenographically, before a Certified Shorthand Reporter
25 authorized to administer oaths in the State of California who is present at the specified times and
26 place. The deposition shall continue day to day, except Sundays and holidays, until completed.

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28 AMENDED NOTICE OF TAKING DEPOSITION OF RESPONDENT, MITCHEL PAUL GOLDMAN
In re Marriage of Goldman - Case No. DN149413

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NOTICE IS FURTHER GIVEN that if an interpreter is required to translate testimony, notice of the same must be given at least ten (10) working days before the deposition date, and the specific language and/or dialect thereof designated.

The deposition may also be recorded by videotape as authorized by *California Code of Civil Procedure* §§ 2025.220(a)(5), 2025.340 before a certified shorthand reporter/notary public and shall continue from day-to-day, excluding Sundays and holidays, until completed. Petitioner reserves the right to use any videotaped portion of the deposition testimony at a hearing or trial in this matter. The deposition may also be recorded through such means as to provide the instant display of the testimony as also authorized by *California Code of Civil Procedure* § 2025.340.

NOTICE IS FURTHER GIVEN that pursuant to *California Code of Civil Procedure* §§ 2025.220 and 2025.280, deponent, MITCHEL PAUL GOLDMAN is requested and required to produce, at the deposition at the time and place set forth above, the writings, documents, and other items listed in 'Exhibit "A," attached hereto and incorporated herein by reference.

Dated: 8-14-19

SULLIVAN LAW & ASSOCIATES



Richard P. Sullivan,
Attorney for Petitioner,
DIANNE YORK GOLDMAN

EXHIBIT "A"

DEFINITIONS

1
2
3 A. The term "WRITING" has the same meaning as the term "WRITING" under Evidence
4 Code Section 250.

5 B. The terms "DOCUMENT" or "RECORDS" as used herein refer to any kind of
6 WRITING, typewriting, printing, photocopy, Xerox or other physical recordation, memorialization
7 or description of a communication or representation, whether oral or written. It specifically includes
8 but is not limited to all papers, books, tapes, DOCUMENTS, computer printouts, computer disc
9 packs, computer tapes and RECORDS of any kind or description (whether inscribed by hand or by
10 mechanical, electrical, electronic, photographic, photo effect or other means).

11 C. "YOU" shall refer to Responding Party MITCHEL PAUL GOLDMAN. "YOUR" as used
12 herein shall refer to and include all DOCUMENTS, RECORDS or WRITINGS in the actual or
13 constructive possession or under the custody, care or control of Responding Party. Actual or
14 constructive possession or under the custody, care or control of Responding Party, shall include
15 DOCUMENTS, RECORDS, and/or WRITINGS in the possession or under the custody, care or control
16 of all attorneys, accountants, agents, servants, family relatives, close friends, and/or employees of
Responding Party's.

17 D. In the event that a DOCUMENT requested herein is not in YOUR possession, custody,
18 or control, YOU are requested to make a good-faith effort to obtain such DOCUMENT, and in the
19 event such DOCUMENT is obtained, to produce that DOCUMENT and to indicate the source thereof.
20 In the event YOU obtain any DOCUMENT requested by this Demand for Production after the date
21 specified herein for the production of same, YOU are hereby advised that YOU are required to
22 produce that DOCUMENT.

23 E. If YOU are unable to obtain the DOCUMENT, YOU are requested to (1) describe the
24 DOCUMENT, indicating the type of DOCUMENT, the date thereof, the writer and the intended
25 recipient, if any; (2) summarize briefly the contents of that DOCUMENT; and (3) indicate to the best
26 of YOUR ability the DOCUMENT's present of last known location and custodian.

1 F. In the event that YOU contend a DOCUMENT requested by this Request for
2 Production is privileged and YOU, therefore, on that basis will not produce such DOCUMENT, YOU
3 are required to (1) describe the DOCUMENT including, not by way of limitation, the type of
4 DOCUMENT, the writer and the intended recipient, if any; (2) identify the privilege upon which
5 YOUR refusal to produce the DOCUMENT is based; and (3) describe those facts and circumstances
6 upon which YOU base YOUR claim of privilege. If the attorney/client privilege or attorney work-
7 produce privilege is claimed, please set forth the name of the attorney involved, the respective client
8 and the circumstances which YOU contend support YOUR claim of privilege.

9 DEMAND FOR PRODUCTION OF DOCUMENTS

10 Documents requested are for the period of January 1, 2006, to the date of production unless
11 otherwise specified:

12 1. Any and all tax returns filed with the federal and/or state governments together with
13 all schedules, including K-1's, attendant workup sheets, tax liabilities, tax bills, and any amended
14 returns prepared by you or on your behalf for the tax years 2007 and 2008.

15 2. Any and all tax returns filed with the federal and state governments together with all
16 schedules, including K-1's, attendant workup sheets, tax liabilities, tax bills, and any amended
17 returns filed by you or on your behalf for the tax years 2007 and 2008.

18 3. Any and all drafts of YOUR personal federal and state tax returns for the tax years
19 2007 and 2008.

20 4. Any and all DOCUMENTS and/or records pertaining to, and describing matters
21 related, directly or indirectly, to YOUR receipt of a refund of taxes from the federal and/or any state
22 taxing authorities, for the tax years 2007 and 2008 including, but not limited to, copies of checks
23 and/or bank statements reflecting receipt of same.

24 5. Any and all DOCUMENTS and/or records pertaining to, and describing matters
25 related, directly or indirectly, to YOUR payment of taxes owed to the federal and/or any state taxing
26 authorities, for the tax years 2007 and 2008 including, but not limited to, copies of tax vouchers,

1 invoices, checks, correspondence from said taxing authorities, and/or bank statements reflecting
2 payment of same.

3 6. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
4 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
5 stored information transmitted between you and Ernest Howard, CPA relating to, pertaining to,
6 and/or describing matters related, directly or indirectly, to the drafting, filing, and amending of any
7 and all personal tax returns with the federal and any state governments for the tax years 2007 and
8 2008.

9 7. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
10 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
11 stored information transmitted between you and Frank Ortiz relating to, pertaining to, and/or
12 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
13 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

14 8. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
15 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
16 stored information transmitted between you and Lillian Wills relating to, pertaining to, and/or
17 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
18 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

19 9. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
20 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
21 stored information transmitted between you and Petitioner, Dianne York Goldman relating to,
22 pertaining to, and/or describing matters related, directly or indirectly, to the drafting, filing, and
23 amending of any and all personal tax returns with the federal and any state governments for the tax
24 years 2007 and 2008.

25 10. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
26 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically

1 stored information transmitted between you and Kimberly Butterwick relating to, pertaining to,
2 and/or describing matters related, directly or indirectly, to the drafting, filing, and amending of any
3 and all personal tax returns with the federal and any state governments for the tax years 2007 and
4 2008.

5 II. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
6 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
7 stored information transmitted between you and Dan Close relating to, pertaining to, and/or
8 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
9 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

10 12. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
11 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
12 stored information transmitted between you and Norbert Frassa relating to, pertaining to, and/or
13 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
14 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

15 13. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
16 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
17 stored information transmitted between you and Jay Schechter relating to, pertaining to, and/or
18 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
19 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

20 14. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
21 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically
22 stored information transmitted between you and Robert F. Doman relating to, pertaining to, and/or
23 describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all
24 personal tax returns with the federal and any state governments for the tax years 2007 and 2008.

25 15. Any and all DOCUMENTS, communications, audio or video, letters, correspondence,
26 e-mails, email attachments, notes, memoranda, agreements, spreadsheets, and all electronically

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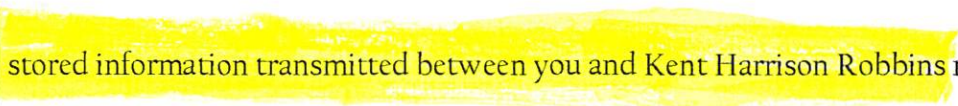
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stored information transmitted between you and Kent Harrison Robbins relating to, pertaining to, and/or describing matters related, directly or indirectly, to the drafting, filing, and amending of any and all personal tax returns with the federal and any state governments for the tax years 2007 and 2008.