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**FILED**  
Superior Court of California  
County of Los Angeles

06/10/2024

David W. Slayton, Executive Officer / Clerk of Court

By:                     A. Robledo                     Deputy

11 Attorneys for Plaintiff ONETASTE INCORPORATED

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

14 ONETASTE INCORPORATED,  
15 Plaintiff,

16 vs.

17 AYRIES BLANCK,  
18 Defendant.

) CASE NO. 22STCV33093  
) [Assigned For All Purposes To  
) Hon. Rupert A. Byrdsong - Dept. 28]

) Complaint Filed: October 7, 2022

) Disc. Cut-Off: January 24, 2025  
) FSC: February 14, 2025  
) Trial Date: February 24, 2025

19 **INFORMAL DISCOVERY**  
20 **CONFERENCE - JOINT STATEMENT**  
21 **OF DISCOVERY REGARDING (1) THE**  
22 **PRODUCTION OF DOCUMENTS AND**  
23 **SECOND SUPPLEMENTAL**  
24 **RESPONSES OF DEFENDANT AYRIES**  
25 **BLANCK TO REQUESTS FOR**  
26 **PRODUCTION (Set One), AND (2) THE**  
27 **PRODUCTION OF DOCUMENTS AND**  
28 **RESPONSES OF PLAINTIFF**  
**ONETASTE INCORPORATED TO**  
**REQUESTS FOR PRODUCTION**

Informal Discovery Conference:

Date: June 13, 2024

Time: 9:00 a.m.

Dept: 28

**RESERVATION NO.: 488053337473**

1 **PLAINTIFF’S POSITION STATEMENT**

2 **I. INTRODUCTION**

3 Plaintiff OneTaste Incorporated (“Plaintiff”) is a wellness education company  
4 whose mission is to provide individuals with teaching and trainings into living a desire-  
5 based life, rooted in a felt-sense of connection. Its focus is the study and practice of  
6 Orgasmic Meditation (hereinafter “OM”). Plaintiff filed this lawsuit against its former  
7 employee, Defendant Ayries Blanck (“Defendant”) for breach of contract and fraudulent  
8 inducement in connection with a Confidential Settlement Agreement (“Agreement”) that  
9 was entered into between the parties on or about December 16, 2015. Defendant had made  
10 a claim, among other things, that Plaintiff had forced and manipulated her into having sex  
11 with Plaintiff’s staff, supervisors, and customers. Although these allegations were  
12 completely false, following a cost of litigation analysis, Plaintiff agreed informally to  
13 resolve Defendant’s claims without litigation, under the terms of the Agreement, which  
14 included comprehensive Confidentiality and Non-Defamation provisions.

15 Defendant breached the Settlement Agreement by, among other things, posting her  
16 first of many defamatory comments about Plaintiff in the comment section of an online  
17 article, and by subsequently making countless statements that were repeated in other  
18 media, including a 2018 Bloomberg article, a 2022 Netflix documentary (in which  
19 Defendant’s sister appeared prominently, repeating Defendant’s underlying claims), a  
20 BBC Podcast, and a Playboy article. In fact, Defendant’s false statements ultimately led to  
21 a five-year FBI investigation and (current) prosecution of Plaintiff’s founder and its head  
22 of sales.

23 Plaintiff’s First Set of Requests for Production of Documents was already the  
24 subject of a prior IDC on November 3, 2023, at which this Court ordered Defendant to  
25 amend her original responses, and to produce responsive documents. However, Defendant  
26 has since served two sets of amended responses, those responses are not Code-compliant,  
27 and she has produced a minimal amount of responsive documents. Defendant’s original  
28 responses, supplemental responses, and second supplemental responses to the  
aforementioned Requests for Production are attached hereto as Exhibits “A,” “B,” and  
“C,” respectively.

1           **I. DISCOVERY**

2                   **A. Defendant’s Responses to Requests for Production And Failure to**  
3                   **Produce Documents**

4           During Plaintiff’s meet and confer attempts to obtain additional documents from  
5 Defendant<sup>1</sup>, Plaintiff asked for documents that Defendant had previously agreed to  
6 produce, including, but not limited to: (1) communications between Defendant and Ellen  
7 Huet of Bloomberg News (Request Nos. 12 and 24); (2) communications between  
8 Defendant and her sister, Autymn Blanck, including the transmission and production of  
9 Defendant’s own “journals” that were read by Autymn on camera in the damning Netflix  
10 Documentary (Request No. 16); and (3) communications between Defendant and her ex-  
11 boyfriend, Ravi Agrawal (whom Defendant claims to have raped her, with Plaintiff’s  
12 knowledge and consent during her time with OneTaste) (Request No. 29).

13           However, despite previously agreeing to produce all such documents, Defendant’s  
14 counsel has now stated that: “***[a] few years ago, Ms. Blanck grew very concerned from***  
15 ***OneTaste’s constant outreach, and took measures to cut herself off from all ties to***  
16 ***OneTaste. She no longer has access to the phone, Gmail, or other accounts that***  
17 ***connected her to OneTaste.***” After Plaintiff’s counsel mentioned the word “spoliation” to  
18 Defendant’s counsel, Defendant’s counsel assured Plaintiff’s counsel that these steps were  
19 taken by Defendant *prior* to the filing of this lawsuit. Thereafter, in her Second Supple-  
20 mental Responses, Defendant stated the following: “***Given the duration of time between***  
21 ***December 2015 and October 2022,***” (when this suit was filed) “***Responding Party no***  
22 ***longer has possession, custody, or control of certain electronics she used prior to the***  
23 ***filing of this lawsuit.***” (See Exh. C, Responses to Nos. 11-13, 16-18, 22, 24, 29).

24 \_\_\_\_\_  
25 <sup>1</sup> To date, Defendant has produced only 620 pages of documents (over 70 pages of which are  
26 partially or completely redacted); Plaintiff, on the other hand, has produced 33,487 pages of  
27 documents (with more forthcoming), including numerous communications between *Defendant* and  
28 current and former employees and customers of OneTaste (**which should have been produced by Defendant**). These communications clearly demonstrate that Defendant initiated numerous sexual interactions that she claims were non-consensual and/or forced by Plaintiff, and openly discussed those interactions. A handful of these relevant communications withheld by Defendant are collectively attached hereto as Exhibit “I.”

1           However, this statement does not appear to be true. Defendant, herself, has  
2 produced two e-mail communications from [ayries.blanck@gmail.com](mailto:ayries.blanck@gmail.com) dated November 10,  
3 2022 (forwarding two other e-mails from the same account dated October 27, 2022 and  
4 October 29, 2022), evidencing that Defendant clearly still had access to her Gmail account  
5 over a month *after* this lawsuit was filed (on October 7, 2022). See Exhibits “D” and “E.”

6           This Gmail account is the same e-mail address that Defendant was utilizing back in  
7 2015 in her dealings with OneTaste; the same account to which her attorneys claim she  
8 lost access “prior to the filing of this lawsuit.” Another e-mail from Defendant, from the  
9 same account, dated January 11, 2015, is attached hereto as Exhibit “F.” Accordingly, one  
10 of two things must be true; **either Defendant is not being truthful about her inability to**  
11 **access her Gmail account, or she was not being truthful about when she deleted that**  
12 **account, and did so after the start of the litigation, in which case she is guilty of**  
13 **spoliation of evidence.**

14           Additionally, Plaintiff requested the production of journals that Defendant  
15 supposedly wrote in 2015 (prior to the execution of the underlying Settlement Agreement),  
16 which journals became the focal point of the Netflix documentary when her sister, Autymn  
17 Blanck, read from them on camera, in a very damning narrative. Defendant refused to  
18 produce any copies of the journals, claiming to no longer have any copies in her  
19 “possession, custody, or control.”

20           Plaintiff then had to subpoena copies of Defendant’s journal from her sister. After  
21 many months of meeting and conferring between Plaintiff’s counsel and Autymn Blanck’s  
22 counsel, Autymn finally produced them, along with metadata evidencing, among other  
23 things, that the journals were originally created as Google docs, in or about May of 2022,  
24 six months before the Netflix documentary was released, and were altered by Defendant as  
25 recently as March 9, 2023, under the name “Ares M” (rather than Ayries Blanck), *i.e.*,  
26 “Ares Miligan,” which Plaintiff understands to be Defendant’s current married name. See  
27 Exhibit “G.” These documents demonstrate that Defendant certainly had access to the  
28 journals (perhaps in a new Gmail account under her new name (Ares Milligan), well *after*  
the start of the litigation, and likely continues to have access to the journals (and possibly  
other responsive documents), to which she has falsely claimed to no longer have access.

1 Further evidence that Defendant does in fact have access to relevant  
2 communications dating as far back as August, 2014 can be seen in yet another document  
3 produced by her, showing communications between her and other OneTaste employees on  
4 Facebook, which took place on August 4-5, 2014. See Exhibit “H.”

5 It is quite clear from the foregoing that Defendant is playing fast and loose with her  
6 discovery obligations, claiming to have purged everything OneTaste from her accounts,  
7 her electronic devices, and her life “before the litigation commenced.” In light of this  
8 purported purging (which appears to be a misrepresentation), Defendant should be ordered  
9 to turn over her electronic devices to a neutral third-party company so that they can  
10 conduct an independent search of her devices for responsive communications.

11 At the very least, Defendant should be ordered to provide the details of when  
12 exactly she purportedly “cut herself off” from, or deleted<sup>2</sup> any accounts, communications,  
13 and electronics that contain responsive documents, including specifics as to what accounts  
14 (Gmail, texts, social media, etc.) and electronic devices she claims to no longer have  
15 access to, and what steps were taken by her to try to retrieve them (*i.e.*, contacting her  
mobile provider, Google, the Cloud, etc.), etc.<sup>3</sup>

16 **B. Failure To Provide Code-Compliant Responses to Request for**  
17 **Production Nos. 4-6, 8, 9, 11-13, 15-18, 22-30.**

18 Defendant’s Responses are not even Code-compliant. In all of her Responses,  
19 Defendant has just provided some variation of a response asserting that “the responsive  
20 documents no longer exist in Responding Party’s “custody, possession, and/or control,”  
21 including the more recent response that “*Given the duration of time between December*

22 \_\_\_\_\_  
23 <sup>2</sup> As further evidence of Defendant’s bad faith conduct, Plaintiff is attaching a copy of a February  
24 16, 2018 text message exchange between Defendant and former OneTaste employee, Summer  
25 Engman, in which Defendant clearly violates the Settlement Agreement by soliciting Ms. Engman  
26 to speak with a Bloomberg journalist to whom Defendant had been speaking about OneTaste, and,  
in full acknowledgment of her wrongdoing, states to Ms. Engman, “**Also you mind deleting those  
last couple txt messages? I’m deleting them on my end.**” See Exhibit “J” (emphasis added).

27 <sup>3</sup> Plaintiff understands that Defendant intends to raise issues related to Plaintiff’s manner and  
28 collection of documents and materials to be produced, as well as certain objections that Plaintiff has  
made in its responses. The parties have met and conferred on these issues, and due to page  
constraints, Plaintiff is attaching a copy of its meet and confer letter responding to these issues, dated  
May 16, 2024, as Exhibit “K.”

1 2015 and October 2022 (Plaintiff's complaint), Responding Party no longer has  
2 possession, custody, or control of certain electronics she used prior to the filing of this  
3 lawsuit." (See Exh. C, Responses to Nos. 11-13, 16-18, 22, 24, 29).

4 These responses are completely inadequate, and are not in compliance with Code of  
5 Civil Procedure Section 2032.230, which provides that: "[a] representation of inability to  
6 comply with the particular demand for inspection, copying, testing, or sampling **shall**  
7 affirm that a diligent search and a reasonable inquiry has been made in an effort to comply  
8 with that demand. This statement **shall also** specify whether the inability to comply is  
9 because the particular item or category has never existed, has been destroyed, has been  
10 lost, misplaced, or stolen, or has never been, or is no longer, in the possession, custody, or  
11 control of the responding party. The statement **shall** set forth the name and address of any  
12 natural person or organization known or believed by that party to have possession,  
13 custody, or control of that item or category of item." Cal. Code Civ. Proc., § 2032.230  
(emphasis added).

14 The aforementioned supplemental responses are clearly non-compliant with Section  
15 2032.230, as some do not "affirm that a diligent search and a reasonable inquiry has been  
16 made in an effort to comply with the demand," and they all fail to "***set forth the name and***  
17 ***address of any natural person or organization known or believed by [Defendant] to have***  
18 ***possession, custody, or control of that item or category of item,***" as is clearly required.  
19 Cal. Code Civ. Proc., § 2032.230 (emphasis added). Accordingly, Defendant must amend  
20 all of the aforementioned responses to provide Plaintiff with the name and address of any  
21 such person or organization, including, but not limited to her mobile phone provider and/or  
22 e-mail provider during the relevant time periods, so that, if necessary, Plaintiff can  
23 subpoena those third-parties directly for the missing documents.

#### 24 **DEFENDANT'S POSITION STATEMENT**

25 Plaintiff OneTaste Inc. ("OneTaste") and its affiliates stand accused of serving as  
26 the "corporate vehicle" for a human trafficking conspiracy orchestrated by OneTaste's  
27 founder, Nicole Daedone, and its former head of sales, Rachel Cherwitz. See Indictment at  
28

1 ¶¶ 6-13, Exhibit D1<sup>4</sup>; Government’s Memorandum at 7, Exhibit D2. The federal  
2 government (“Government”) alleges that the OneTaste conspirators subjected members “to  
3 constant surveillance” and “collected sensitive information” about them, including their  
4 “sexual histories and relationships, as a means of influencing and controlling” members.  
5 Indictment at ¶ 7(c), (e). The OneTaste conspiracy, as alleged by the Government, has used  
6 the “abuse and threatened abuse of law and legal process” to manipulate, intimidate, and  
7 control its victims. *Id.* at ¶ 12.

8 Defendant Ayries Blanck—a former OneTaste member and staffer—is one of those  
9 victims. OneTaste, armed with sensitive information it has compiled over the last twelve  
10 years, is using the discovery process to inundate Ms. Blanck with, literally, hundreds of  
11 discovery requests that pry into the most intimate details of her personal life. Most  
12 recently, OneTaste falsely accused Ms. Blanck of discovery misconduct and, on that basis,  
13 has demanded that she turn over all her personal devices and data to OneTaste. Meanwhile,  
14 OneTaste—in a highly hypocritical manner—refuses to fulfill its basic discovery  
15 obligations. OneTaste’s allegations of misconduct should be disregarded, and OneTaste  
16 should be ordered to comply with basic discovery rules

## 17 **I. ISSUES RAISED BY ONETASTE**

18 OneTaste has raised purported technical defects in Ms. Blanck’s written responses  
19 in an attempt to manufacture bases for court conferences. Despite repeated assurances that  
20 Ms. Blanck would cure any *legitimate* technical defects in her written responses,  
21 OneTaste’s counsel indicated in a June 6 meet-and-confer that there was nothing that Ms.  
22 Blanck could do to satisfy OneTaste prior to the upcoming IDC. Citing Ms. Blanck’s  
23 production of forwarded e-mails that originate from an account that is no longer accessible,  
24 OneTaste accused Ms. Blanck of “bad faith gamesmanship,” which—according to its  
25 counsel—OneTaste intends to use as grounds for obtaining unfettered access to all of Ms.  
26 Blanck’s communications, devices, and data. OneTaste’s hypocritical allegations of  
27 gamesmanship lack merit.

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28 <sup>4</sup> Herein, Defendant uses the prefix “D” for her exhibit numbers to differentiate from any exhibits  
submitted by Plaintiff.

1 In 2022, with the Government’s trafficking investigation into OneTaste gaining  
2 steam, multiple individuals once associated with OneTaste sent threatening and harassing  
3 communications to Ms. Blanck, urging her *inter alia* not to cooperate with investigators.  
4 *See, e.g.*, E-mail from L. West, Oct. 27, 2022, BLANCK\_0000026, Exhibit D3 (“The FBI  
5 is too far. . . . We need to clean this up.”); E-mail from S. Engman, Oct. 29, 2022,  
6 BLANCK\_0000039, Exhibit D4 (“[OneTaste is] going to have to share a lot of  
7 information that I promise you... you do not want coming out.”). In November 2022, Ms.  
8 Blanck reported the harassing outreach to the FBI, which, in response, stated: “Based on  
9 their statements in the emails they are still associated with OneTaste . . . .” The FBI further  
10 advised Ms. Blanck to “cancel” the e-mail account, noting that the e-mails from OneTaste  
11 associates were designed to make her “feel uneasy.” *See* E-mails with Agent E. McGinnis,  
12 Nov. 7-9, 2022, Exhibit D5. Ms. Blanck, unrepresented at that time, followed the FBI’s  
13 guidance. She did not act in bad faith or commit discovery misconduct.

## 14 **II. ONETASTE’S DISCOVERY DEFICIENCIES**

15 OneTaste has refused to fulfill basic discovery requirements and it has maintained  
16 positions that obscure whether, and to what extent, OneTaste is producing responsive  
17 material. OneTaste’s productions, therefore, are incomplete and unreliable. For starters,  
18 OneTaste has repeatedly made boilerplate objections without indicating whether, or on  
19 what grounds, OneTaste is withholding responsive materials. OneTaste, therefore, is  
20 violating CCP § 2031.240(b). *See* OneTaste Responses to Defendant’s Document Requests  
21 (Set One), Exhibit D6. OneTaste also has ignored its obligations under CCP § 2031.280(d)  
22 by producing material in forms that are not reasonably usable or as the material is  
23 ordinarily maintained—*e.g.*, redactions, partial documents, combining multiple documents  
24 into volumes of PDFs stripped of their metadata. *See Song v. Drenberg*, No. 18-cv-06283-  
LHK (VKD), 2019 U.S. Dist. LEXIS 177358, at \*16 (N.D. Cal. 2019).

25 More fundamentally, OneTaste’s outside counsel has abdicated their duty to collect  
26 and review material for responsiveness by delegating that process entirely to OneTaste  
27 itself, thus putting OneTaste in a position to prevent or delay the production of material  
28 favorable to Ms. Blanck. *Compare* McPherson Letter (May 16, 2024) at 1, Exhibit D7



1 (“[I]n my 23 years of litigation practice, I cannot recall a single case where production  
2 searches were not carried out by the client . . .”), with *Cedars-Sinai Med. Ctr. v. Superior*  
3 *Court* (1998) 18 Cal.4th 1, 12 [74 Cal.Rptr.2d 248, 954 P.2d 511] (stating that lawyers  
4 should “marshal and take charge of the client’s evidence, most often at an early stage of  
5 litigation”); *De Abadia-Peixoto v. United States Dep’t of Homeland Sec.*, No. CV 11-  
6 04001 RS (KAW), 2013 U.S. Dist. LEXIS 120368, at \*8 (N.D. Cal. 2013) (“In the era of  
7 e-discovery, attorneys must take responsibility for ensuring that their clients conduct a  
8 comprehensive and appropriate document search.”).

9 Turning a blind eye to a client-led document review process is especially  
10 problematic in this case, given that OneTaste has been identified as the “corporate vehicle”  
11 for an alleged human trafficking conspiracy that has used the “abuse and threatened abuse  
12 of law and legal process” against its victims. See Indictment at ¶¶ 7, 12; Government’s  
13 Memo at 8; see also *Optrics Inc. v. Barracuda Networks Inc.*, No. 17-cv-04977-RS (TSH),  
14 2021 U.S. Dist. LEXIS 21738, at \*24 (N.D. Cal. 2021) (describing a “client-led search”  
for documents as “not reasonable”).

15 Against this backdrop, counsel for Ms. Blanck urged OneTaste’s outside counsel to  
16 take control of the document review process, revise OneTaste’s written responses to  
17 comply with CCP § 2031.240(b), reprocess its productions in a usable and reliable format,  
18 and share the terms, custodians, and other criteria used to search OneTaste’s data for  
19 responsive material. See *Baranco v. Ford Motor Co.*, No. 17-cv-03580-EMC, 2018 U.S.  
20 Dist. LEXIS 60978, at \*2 (N.D. Cal. 2018) (“It is well-established that, when search terms  
21 are used in ESI discovery, the parties should cooperate to select reasonable search terms  
22 and custodians.”). OneTaste’s outside counsel refused. In fact, counsel revealed that they  
23 cannot disclose the parameters of OneTaste’s searches (or even identify what responsive  
24 material has been withheld per CCP § 2031.240(b)) because document review has been left  
to the discretion of OneTaste itself.

25 Put simply, OneTaste’s document review process is fundamentally flawed. **Under**  
26 **these circumstances, OneTaste should be ordered to (i) revise its written responses to**  
27 **comply with CCP § 2031.240(b), (ii) reprocess its productions consistent with the**  
28 **format that the Sedona Principles describe as “the most common way to produce ESI**

1 for more than a decade,”<sup>5</sup> (iii) disclose the terms, custodians, and other parameters  
2 used to search OneTaste’s data for responsive material, and (iv) abandon its client-  
3 led document review process in favor of one in which outside counsel collects,  
4 reviews, and produces responsive material.

5 In addition, OneTaste is blatantly refusing to fulfill its privilege log obligations.  
6 *Compare* McPherson Letter at 6 (“[P]roviding a privilege log for each and every such  
7 communication would be unduly burdensome and oppressive. Plaintiff will not engage in  
8 such an exercise.”), with CCP § 2031.240(c) and *Hernandez v. Superior Court* (2003) 112  
9 Cal.App.4th 285, 291, fn. 6 [4 Cal.Rptr.3d 883] (explaining that a privilege log must  
10 identify “each document for which a privilege is claimed, with its author, date of  
11 preparation, all recipients, and the specific privilege claimed”). **OneTaste should be  
12 ordered to log each document withheld for privilege.**

13 OneTaste, thus far, has logged two contracts with public-relations firms. *See*  
14 OneTaste Privilege Log, Exhibit D8. But, under blackletter California law, such materials  
15 are not privileged. *See Behunin v. Superior Court* (2017) 9 Cal.App.5th 833, 845 [215  
16 Cal.Rptr.3d 475]. OneTaste otherwise does nothing to carry its privilege burden and, even  
17 if OneTaste had, any such privilege has been waived given that OneTaste seeks damages  
18 for public-relations fees. **OneTaste should be ordered to produce all materials  
19 reflecting its public-relations efforts.**

20 OneTaste also has withheld and claimed privilege over (albeit without logging)  
21 various materials it has provided to the Government, including dozens of recorded witness  
22 interviews. *See* Declaration of Paul Pelletier at ¶ 40, Exhibit D9. Any privilege attaching to  
23 those materials was waived by disclosure to the government. *See McKesson HBOC, Inc. v.*  
24 *Superior Court* (2004) 115 Cal.App.4th 1229, 1239 [9 Cal.Rptr.3d 812]. **OneTaste  
25 should be ordered to produce all recorded witness interviews and any other materials**

26 ///

27 ///

28 ///

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<sup>5</sup> *The Sedona Principles, Third Edition: Best Practices, Recommendations & Principles for Addressing Electronic Document Production*, 19 SEDONA CONF. J. 1, 172 (2018).



**PLAINTIFF ONETASTE INCORPORATED  
EXHIBITS A TO K**

# **EXHIBIT "A"**

1 BURKHALTER KESSLER CLEMENT & GEORGE LLP  
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7 Attorneys for Defendant, Ayries Blanck

8

SUPERIOR COURT OF THE STATE OF CALIFORNIA

9

FOR THE COUNTY OF LOS ANGELES

10

11 ONETASTE INCORPORATED, a California  
corporation,

12

Plaintiff,

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14 vs.

15 AYRIES BLANCK, an individual; and DOES 1  
through 100, inclusive,

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17 Defendants.

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Case No. 22STCV33093

Assigned To: Hon. Rupert A. Byrdsong  
Department 28

**DEFENDANT AYRIES BLANCK'S  
RESPONSE TO PLAINTIFF ONETASTE  
INCORPORATED'S FIRST SET OF  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

Action Filed: October 7, 2022

Trial Date: June 10, 2024

1 **PROPOUNDING PARTIES:** Plaintiff OneTaste Incorporated

2 **RESPONDING PARTY:** Defendant Ayries Blanck

3 **SET NO.:** One

4  
5 Defendant Ayries Blanck (“Responding Party”) hereby responds to Plaintiff OneTaste  
6 Incorporated’s (“Propounding Party”) first set of requests for production.

7  
8 **PRELIMINARY STATEMENT**

9 The following responses are based upon the facts and information presently known and  
10 available to Responding Party after a diligent search and reasonable inquiry. The responses refer only  
11 to those contentions which have been asserted to date by Responding Party based on the facts now  
12 known to it. Discovery, investigation, research and analysis are still ongoing in this case and may  
13 disclose the existence of additional facts, variations, and changes to these responses. Without obligation  
14 to do so, Responding Party reserves the right to change or supplement these responses as additional facts  
15 are discovered, revealed, recalled or otherwise ascertained, and as further analysis and research disclose  
16 additional facts, contentions or legal theories which may well apply.

17  
18 **GENERAL OBJECTIONS**

19 The responses which are set forth below are submitted subject to the objections set forth  
20 herein, and are based upon the current knowledge of Responding Party, and upon such investigation  
21 which was reasonable for Responding Party to undertake under the circumstances of the case.  
22 Responding Party interposes the following general objections to these interrogatories. These objections  
23 are made to each and every individual Request, and subpart thereof, and are incorporated by reference  
24 into each of the specific responses which are set forth below.

25 These responses are made solely for the purpose of this specific action. Each answer is  
26 subject to all appropriate objections including, but not limited to, objections concerning competency,  
27 relevancy, materiality, propriety and admissibility, which would require the exclusion of any statement  
28 contained herein if the question were asked of, or any statement contained herein were made by, a

1 witness present and testifying in court. All such objections and grounds are reserved and may be  
2 interposed at the time of trial.

3           Furthermore, Responding Party has not completed its investigation of the facts relating  
4 to this case, has not completed discovery in this action, has not yet received all reports and/or opinions  
5 from its expert witnesses, and has not completed preparation for trial. All of the responses contained  
6 herein are based only upon such information and documents that are immediately available to and  
7 specifically known at this time to Responding Party. As discovery proceeds, information, facts and  
8 witnesses may be discovered that were not identified in response to these interrogatories, but which may  
9 have been responsive to document requests.

10           Additionally, facts and evidence now known may be imperfectly understood, or the  
11 relevance or consequence of such facts and evidence may be imperfectly understood and, accordingly,  
12 such facts and evidence may, in good faith, not be identified in response to these interrogatories.

13           It is also anticipated that further discovery, independent investigation, legal research and  
14 analysis will supply additional facts, add meaning to the known facts, as well as establish entire new  
15 factual conclusions and legal contentions, all of which may lead to substantial additions to or changes  
16 in these responses.

17           These responses are thus given without prejudice to Responding Party's right to later use  
18 or produce any such facts or witnesses which Responding Party may later locate, recall or ascertain.  
19 Responding Party accordingly reserves the right to change any and all answers contained herein  
20 accordingly, if a proper supplemental request is made.

21           Responding Party assumes no obligation beyond those imposed by law to voluntarily  
22 supplement or amend these responses to reflect witnesses, facts and evidence following the service of  
23 these responses. In addition, because some of these responses may have been ascertained by Responding  
24 Party's agents, attorneys and/or investigators, Responding Party may not have personal knowledge of  
25 the information from which these responses are derived.





1 **RESPONSE TO REQUEST NO. 2:**

2 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
3 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
4 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
5 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
6 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

7 Responding Party made a diligent search and found no documents responsive to this  
8 Request because no such documents exist, as Responding Party made no disparaging remarks regarding  
9 Plaintiff since she signed the Settlement Agreement in or about December 2015.

10  
11 **REQUEST FOR PRODUCTION NO. 3:**

12 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
13 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
14 relate to, refer to, or may provide evidence of, any and all disparaging remarks about Plaintiff or its  
15 current or former officers or employees that YOU have made to third parties about Plaintiff and/ or any  
16 of its current or former officers or employees, from December 16, 2015 through the present.

17 **RESPONSE TO REQUEST NO. 3:**

18 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
19 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
20 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
21 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
22 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

23 Responding Party made a diligent search and found no documents responsive to this  
24 Request because no such documents exist, as Responding Party made no disparaging remarks regarding  
25 Plaintiff since she signed the Settlement Agreement in or about December 2015.

26  
27 **REQUEST FOR PRODUCTION NO. 4:**

28 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,

1 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
2 relate to, refer to, or may provide evidence of, any and all CONFIDENTIAL INFORMATION that YOU  
3 have disclosed to third parties about Plaintiff and/or any of its current or former officers or employees,  
4 from December 16, 2015 through the present.

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

6 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
7 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
8 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
9 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
10 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
11 to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing  
12 objections, Responding Party responds as follows:

13 Responding Party made a diligent search and found no documents responsive to this  
14 Request because no such documents exist.

15  
16 **REQUEST FOR PRODUCTION NO. 5:**

17 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
18 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
19 relate to, refer to, or may provide evidence of, any and all CORRESPONDENCE in which YOU  
20 attached, quoted, or described the AGREEMENT, or any portions thereof, from December 16, 2015  
21 through the present.

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

23 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
24 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
25 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
26 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
27 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
28 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent

1 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
2 confidential information of third parties. Subject to, and without waiving the foregoing objections,  
3 Responding Party responds as follows:

4 Responding Party will produce all non-privileged documents responsive to this Request.  
5

6 **REQUEST FOR PRODUCTION NO. 6:**

7 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
8 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
9 relate to, refer to, or may provide evidence of, any and all statements that YOU have made concerning  
10 the AGREEMENT in a public forum, from December 16, 2015 through the present.

11 **RESPONSE TO REQUEST NO. 6:**

12 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
13 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
14 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
15 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
16 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

17 Responding Party made a diligent search and found no documents responsive to this  
18 Request because no such documents exist.  
19

20 **REQUEST FOR PRODUCTION NO. 7:**

21 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
22 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
23 relate to, refer to, or may provide evidence of, any and all statements that YOU have made concerning  
24 the AGREEMENT on a social media platform, from December 16, 2015 through the present.

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

26 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
27 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
28 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-

1 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
2 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

3           Responding Party made a diligent search and found no documents responsive to this  
4 Request because no such documents exist.

5  
6 **REQUEST FOR PRODUCTION NO. 8:**

7           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
8 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
9 relate to, refer to, or may provide evidence of, YOUR encouragement of third parties to disclose  
10 CONFIDENTIAL INFORMATION about Plaintiff, from December 16, 2015 through the present.

11 **RESPONSE TO REQUEST NO. 8:**

12           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
13 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
14 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
15 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
16 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
17 to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing  
18 objections, Responding Party responds as follows:

19           Responding Party made a diligent search and found no documents responsive to this  
20 Request because no such documents exist.

21  
22 **REQUEST FOR PRODUCTION NO. 9:**

23           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
24 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
25 relate to, refer to, or may provide evidence of, any and all documents that YOU fabricated in order to  
26 support YOUR claims against Plaintiff that were settled by the AGREEMENT.

27 **RESPONSE TO REQUEST NO. 9:**

28           Responding Party objects to this Request on the grounds that it is vague, ambiguous,

1 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
2 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
3 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
4 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

5           Responding Party made a diligent search and found no documents responsive to this  
6 Request because no such documents exist.

7  
8 **REQUEST FOR PRODUCTION NO. 10:**

9           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
10 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
11 relate to, refer to, or may provide evidence of, any and all COMMUNICATIONS with any of Plaintiffs  
12 former or current employees from December 16, 2015 through the present.

13 **RESPONSE TO REQUEST NO. 10:**

14           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
15 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
16 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
17 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
18 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
19 to lead to the discovery of admissible evidence. Responding Party further objects to this Request to the  
20 extent that it seeks documents and information already in the possession, custody, and/or control of  
21 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
22 responds as follows:

23           Responding Party will produce all non-privileged documents responsive to this Request.

24  
25 **REQUEST FOR PRODUCTION NO. 11:**

26           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
28 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ruwan Meepagala

1 from December 16, 2015 through the present.

2 **RESPONSE TO REQUEST NO. 11:**

3           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
4 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
5 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
6 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
7 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
8 to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing  
9 objections, Responding Party responds as follows:

10           Responding Party made a diligent search and found no documents responsive to this  
11 Request because no such documents exist.

12  
13 **REQUEST FOR PRODUCTION NO. 12:**

14           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
15 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
16 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ellen Huet from  
17 December 16, 2015 through the present.

18 **RESPONSE TO REQUEST NO. 12:**

19           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
20 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
21 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
22 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
23 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

24           Responding Party made a diligent search and found no documents responsive to this  
25 Request because the responsive documents no longer exist in Responding Party's care, custody,  
26 possession, and/or control.

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

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
4 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Peter Crann from  
5 December 16, 2015 through the present.

6 **RESPONSE TO REQUEST NO. 13:**

7 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
8 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
9 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
10 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
11 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
12 to lead to the discovery of admissible evidence. Responding Party further objects to this Request to the  
13 extent that it seeks documents and information already in the possession, custody, and/or control of  
14 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
15 responds as follows:

16 Responding Party made a diligent search and found no documents responsive to this  
17 Request because the responsive documents no longer exist in Responding Party's care, custody,  
18 possession, and/or control.

19  
20 **REQUEST FOR PRODUCTION NO. 14:**

21 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
22 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
23 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Summer Engman  
24 from December 16, 2015 through the present.

25 **RESPONSE TO REQUEST NO. 14:**

26 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
27 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
28 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-



1 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
2 217.) Responding Party objects to this Request to the extent it seeks disclosure of confidential  
3 information of Responding Party that is confidential and also seeks confidential information of third  
4 parties. Subject to, and without waiving the foregoing objections, Responding Party responds as  
5 follows:

6           Responding Party will produce all non-privileged documents responsive to this Request.  
7

8 **REQUEST FOR PRODUCTION NO. 15:**

9           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
10 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
11 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Sarah Gibson from  
12 December 16, 2015 through the present.

13 **RESPONSE TO REQUEST NO. 15:**

14           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
15 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
16 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
17 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
18 217.) Responding Party objects to this Request to the extent it seeks disclosure of confidential  
19 information of Responding Party that is confidential and also seeks confidential information of third  
20 parties. Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

21           Responding Party made a diligent search and found no documents responsive to this  
22 Request because the responsive documents no longer exist in Responding Party's care, custody,  
23 possession, and/or control.  
24

25 **REQUEST FOR PRODUCTION NO. 16:**

26           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
28 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Autymn Blanck

1 about Plaintiff from December 16, 2015 through the present.

2 **RESPONSE TO REQUEST NO. 16:**

3 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
4 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
5 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
6 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
7 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
8 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
9 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
10 confidential information of third parties. Responding Party further objects to this Request to the extent  
11 that it seeks documents and information already in the possession, custody, and/or control of  
12 Propounding Party.

13  
14 **REQUEST FOR PRODUCTION NO. 17:**

15 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
16 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
17 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Rachael Hemi  
18 between January 1, 2014 and December 31, 2014.

19 **RESPONSE TO REQUEST NO. 17:**

20 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
21 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
22 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
23 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
24 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
25 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
26 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
27 confidential information of third parties. Responding Party further objects to this Request to the extent  
28 that it seeks documents and information already in the possession, custody, and/or control of

1 Propounding Party.  
2

3 **REQUEST FOR PRODUCTION NO. 18:**

4 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
5 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
6 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Courtenay Lapovsky  
7 between January 1, 2014 and December 31, 2014.

8 **RESPONSE TO REQUEST NO. 18:**

9 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
10 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
11 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
12 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
13 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
14 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
15 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
16 confidential information of third parties. Responding Party further objects to this Request to the extent  
17 that it seeks documents and information already in the possession, custody, and/or control of  
18 Propounding Party.  
19

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

21 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
22 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
23 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Chris Kosley from  
24 January 1, 2014 through the present.

25 **RESPONSE TO REQUEST NO. 19:**

26 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
27 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
28 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-

1 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
2 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
3 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
4 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
5 confidential information of third parties. Responding Party further objects to this Request to the extent  
6 that it seeks documents and information already in the possession, custody, and/or control of  
7 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
8 responds as follows:

9           Responding Party will produce all non-privileged documents responsive to this Request  
10 from the time relevant time period of December 15, 2015 through the present.

11  
12 **REQUEST FOR PRODUCTION NO. 20:**

13           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
14 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
15 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Casey Tepp between  
16 January 1, 2014 and December 31, 2014.

17 **RESPONSE TO REQUEST NO. 20:**

18           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
19 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
20 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
21 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
22 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
23 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
24 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
25 confidential information of third parties. Responding Party further objects to this Request to the extent  
26 that it seeks documents and information already in the possession, custody, and/or control of  
27 Propounding Party.

1 **REQUEST FOR PRODUCTION NO. 21:**

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
4 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with by Rob Kandell from  
5 January 1, 2014 through the present.

6 **RESPONSE TO REQUEST NO. 21:**

7 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
8 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
9 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
10 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
11 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
12 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
13 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
14 confidential information of third parties. Responding Party further objects to this Request to the extent  
15 that it seeks documents and information already in the possession, custody, and/or control of  
16 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
17 responds as follows:

18 Responding Party will produce all non-privileged documents responsive to this Request  
19 from the time relevant time period of December 15, 2015 through the present.

20  
21 **REQUEST FOR PRODUCTION NO. 22:**

22 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
23 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
24 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Aubrey Fuller from  
25 January 1, 2014 through the present.

26 **RESPONSE TO REQUEST NO. 22:**

27 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
28 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that

1 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
2 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
3 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
4 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
5 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
6 confidential information of third parties. Responding Party further objects to this Request to the extent  
7 that it seeks documents and information already in the possession, custody, and/or control of  
8 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
9 responds as follows:

10           Responding Party made a diligent search and found no documents responsive to this  
11 Request from the time relevant time period of December 15, 2015 through the present, because no such  
12 documents exist.

13  
14 **REQUEST FOR PRODUCTION NO. 23:**

15           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
16 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
17 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Justine Dawson from  
18 January 1, 2014 through the present.

19 **RESPONSE TO REQUEST NO. 23:**

20           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
21 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
22 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
23 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
24 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
25 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
26 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
27 confidential information of third parties. Responding Party further objects to this Request to the extent  
28 that it seeks documents and information already in the possession, custody, and/or control of

1 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
2 responds as follows:

3           Responding Party made a diligent search and found no documents responsive to this  
4 Request from the time relevant time period of December 15, 2015 through the present, because no such  
5 documents exist.

6  
7 **REQUEST FOR PRODUCTION NO. 24:**

8           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
9 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
10 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Bloomberg from  
11 December 16, 2015 through the present.

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

13           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
14 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
15 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
16 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
17 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

18           Responding Party made a diligent search and found no documents responsive to this  
19 Request because no such documents exist.

20  
21 **REQUEST FOR PRODUCTION NO. 25:**

22           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
23 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
24 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Netflix from  
25 December 16, 2015 through the present.

26 **RESPONSE TO REQUEST NO. 25:**

27           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
28 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that

1 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
2 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
3 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

4           Responding Party made a diligent search and found no documents responsive to this  
5 Request because no such documents exist.

6  
7 **REQUEST FOR PRODUCTION NO. 26:**

8           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
9 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
10 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Playboy from  
11 December 16, 2015 through the present.

12 **RESPONSE TO REQUEST NO. 26:**

13           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
14 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
15 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
16 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
17 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

18           Responding Party made a diligent search and found no documents responsive to this  
19 Request because no such documents exist.

20  
21 **REQUEST FOR PRODUCTION NO. 27:**

22           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
23 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
24 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with VICE Media from  
25 December 16, 2015 through the present.

26 **RESPONSE TO REQUEST NO. 27:**

27           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
28 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that



1 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
2 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
3 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

4           Responding Party made a diligent search and found no documents responsive to this  
5 Request because the responsive documents no longer exist in Responding Party's care, custody,  
6 possession, and/or control.

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8 **REQUEST FOR PRODUCTION NO. 28:**

9           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
10 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
11 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with the BBC from  
12 December 16, 2015 through the present.

13 **RESPONSE TO REQUEST NO. 28:**

14           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
15 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
16 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
17 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
18 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

19           Responding Party made a diligent search and found no documents responsive to this  
20 Request because no such documents exist.

21  
22 **REQUEST FOR PRODUCTION NO. 29:**

23           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
24 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
25 relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ravi Agrawal from  
26 December 16, 2015 through the present.

1 **RESPONSE TO REQUEST NO. 29:**

2           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
3 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
4 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
5 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
6 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
7 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent  
8 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
9 confidential information of third parties. Responding Party further objects to this Request to the extent  
10 that it seeks documents and information already in the possession, custody, and/or control of  
11 Propounding Party. Subject to, and without waiving the foregoing objections, Responding Party  
12 responds as follows:

13           Responding Party made a diligent search and found no documents responsive to this  
14 Request because the responsive documents no longer exist in Responding Party's care, custody,  
15 possession, and/or control.

16  
17 **REQUEST FOR PRODUCTION NO. 30:**

18           Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
19 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern, mention,  
20 relate to, refer to, or may provide evidence of, any and all of YOUR postings and other activity on Tinder  
21 between January 1, 2010 and December 16, 2015.

22 **RESPONSE TO REQUEST NO. 30:**

23           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
24 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
25 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
26 product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
27 217.) Responding Party further objects to this Request on the grounds that it is not reasonably calculated  
28 to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent

1 it seeks disclosure of confidential information of Responding Party that is confidential and also seeks  
2 confidential information of third parties.

3  
4 Dated: August 8, 2023

BURKHALTER KESSLER CLEMENT & GEORGE LLP

5 By: /s/ Michael P. McConnell

6 Joshua A. Waldman, Esq.

7 Ros M. Lockwood, Esq.

8 Michael P. McConnell, Esq.

9 Attorneys for Defendant, Ayries Blanck  
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1 **PROOF OF SERVICE**

2  
3 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

4 I am employed in the County of Orange, State of California. I am over the age of 18  
5 years and not a party to the within action; my business address is 2020 Main Street, Suite 600, Irvine,  
6 California 92614.

7 On **August 8, 2023**, I caused the foregoing document described as **DEFENDANT**  
8 **AYRIES BLANCK'S RESPONSE TO PLAINTIFF ONETASTE INCORPORATED'S FIRST**  
9 **SET OF REQUEST FOR PRODUCTION OF DOCUMENTS** to be served on the interested parties  
in this action  by placing  the original  a true copy thereof enclosed in a sealed envelope  
addressed as stated on the attached service list.

10  **BY ELECTRONIC TRANSMISSION**

11  I sent via electronic transmission on this date, originating from  
12 **cadorner@bkcglaw.com**, a copy of the above-referenced document to the addressee(s) at the e-mail  
address(es) indicated on the attached Service List.

13  **(State)** I declare under penalty of perjury under the laws of the State of California that the  
14 above is true and correct.

15  **(Federal)** I declare that I am employed in the office of a member of the bar of this court at  
16 whose direction the service was made.

17 Executed on **August 8 2023**, at **Irvine, California**.

18  
19 */s/ Courtney Dorner*  
20 **COURTNEY DORNER**

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**SERVICE LIST**

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Designated as Local Counsel

***Intervenors***

# **EXHIBIT "B"**

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7 San Francisco, CA 94105-3659  
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8 Facsimile: +1 415 391 8269

9 Attorneys for Defendant  
Ayries Blanck

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

14 ONETASTE INCORPORATED,  
15 Plaintiff,  
16 vs.  
17 AYRIES BLANCK,  
18 Defendant.

No.: 22STCV33093

**DEFENDANT AYRIES BLANCK'S  
SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO ONETASTE  
INCORPORATED'S REQUEST FOR  
PRODUCTION, SET ONE**

Compl. Filed: October 7, 2022  
Trial Date: June 10, 2024  
Disc. Cut-Off: May 10, 2024

Honorable Rupert A. Byrdsong

22 PROPOUNDING PARTY: ONETASTE INC.

23 RESPONDING PARTY: AYRIES BLANCK

24 SET NO: ONE (Supplemental)



1 Pursuant to California Code of Civil Procedure sections 2033.010 *et seq.*, Defendant Ayries  
2 Blanck (“Responding Party”) provides the following supplemental objections and responses to  
3 Plaintiff OneTaste Incorporated’s (“Propounding Party”) Special Interrogatories, Set One, as follows:

4 **Preliminary Statement**

5 Defendant Ayries Blanck has not completed her factual investigation, discovery, or preparation  
6 for trial in this case. The responses contained herein are based only upon such information and  
7 documentation as is presently and reasonably available and specifically known to Ms. Blanck. It is  
8 anticipated that further discovery, independent investigation, legal research, and analysis will supply  
9 additional facts herein. The following response, therefore, is given without prejudice to Ms. Blanck’s  
10 right to produce or rely on additional evidence at trial or in connection with any pretrial proceedings.  
11 Ms. Blanck accordingly reserves the right to amend or supplement this response as discovery in the  
12 case progresses, as new facts develop, and as new information is obtained. The response contained  
13 herein is made in a good faith effort to supply as much factual information and as much specification  
14 of legal contentions as presently known, but should in no way be to the prejudice of Ms. Blanck in  
15 relation to further discovery, research, or analysis.

16 **GENERAL OBJECTIONS**

17 The following general objections apply to the entirety of Plaintiff’s Interrogatories. The  
18 assertion of the same, similar, or additional objections to an individual Request does not waive any of  
19 Responding Party’s General Objections as set forth below.

- 20 1. Responding Party generally objects to Plaintiff’s Requests to the extent they impose  
21 requirements or limitations other or greater than those set forth in the Code of Civil Procedure.
- 22 2. Responding Party generally objects to Plaintiff’s Requests to the extent the  
23 Interrogatories are overly broad as to time and scope, unduly burdensome and oppressive, vague,  
24 ambiguous, unintelligible, harassing, unreasonable, and/or compound.
- 25 3. Responding Party generally objects to Plaintiff’s Requests to the extent they seek  
26 information that is not relevant to the subject matter of this litigation and not likely to lead to the  
27 discovery of admissible evidence.

1 4. Responding Party generally objects to Plaintiff's Requests to the extent they seek  
2 information protected by the attorney-client privilege and/or the attorney work-product doctrine.

3 5. Responding Party generally objects to Plaintiff's Requests to the extent they seek  
4 confidential information, the disclosure of which would constitute an unwarranted invasion of  
5 protected rights to personal privacy and confidentiality.

6 7. Responding Party generally objects to Plaintiff's Requests to the extent YOU/YOUR  
7 refers to the employees, attorneys, investigators, accountants, managers, agents, entities, or other  
8 persons acting or purporting to act on behalf of Defendant AYRIES BLANCK.

9 8. Responding Party generally objects to Plaintiff's Requests to the extent IDENTIFY  
10 seeks to impose undue burden on Defendant to provide information not in her possession, custody, or  
11 control.

12 **Requests for Production**

13 **REQUEST FOR PRODUCTION NO. 7:**

14 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
15 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
16 mention, relate to, refer to, or may provide evidence of, any and all statements that YOU have made  
17 concerning the AGREEMENT on a social media platform, from December 16, 2015 through the  
18 present.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

20 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
21 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
22 it seeks information protected from disclosure by the attorney client privilege and/or attorney work  
23 product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
24 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

25 Responding Party made a diligent search and found no documents responsive to this Request  
26 because no such documents exist.

27 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

1 Responding Party incorporates the preliminary statement and each of the general objections  
2 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
3 objects to this Request as vague and ambiguous as to “concerning.” Responding Party objects to this  
4 Request as “concerning” is undefined. Responding Party also objects to this Request to the extent  
5 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
6 work product doctrine.

7 Subject to and without waiving its aforementioned objections, Responding Party will produce  
8 all non-privileged documents responsive to this Request.

9 **REQUEST FOR PRODUCTION NO. 11:**

10 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
11 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
12 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ruwan  
13 Meepagala from December 16, 2015 through the present.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

15 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
16 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
17 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
18 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
19 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
20 reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without  
21 waiving the foregoing objections, Responding Party responds as follows:

22 Responding Party made a diligent search and found no documents responsive to this Request  
23 because no such documents exist.

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

25 Responding Party incorporates the preliminary statement and each of the general objections  
26 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
27 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
28

1 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
2 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving its aforementioned objections, Responding Party will produce  
4 all non-privileged documents responsive to this Request.

5 **REQUEST FOR PRODUCTION NO. 12:**

6 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
7 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
8 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ellen  
9 Huet from December 16, 2015 through the present.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

11 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
12 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
13 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
14 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
15 4th 214, 217.) Subject to, and without waiving the foregoing objections, Responding Party responds  
16 as follows:

17 Responding Party made a diligent search and found no documents responsive to this Request  
18 because the responsive documents no longer exist in Responding Party’s care, custody, possession,  
19 and/or control.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

21 Responding Party incorporates the preliminary statement and each of the general objections  
22 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
23 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
24 relate to, refer to, and may provide evidence of.”

25 Subject to and without waiving its aforementioned objections, Responding Party will produce  
26 all non-privileged documents responsive to this Request.

27 **REQUEST FOR PRODUCTION NO. 13:**

28

1 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
2 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
3 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Peter  
4 Crann from December 16, 2015 through the present.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

6 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
7 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
8 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
9 product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
10 217.) Responding Party further objects to this Request on the grounds that it is not reasonably  
11 calculated to lead to the discovery of admissible evidence. Responding Party further objects to this  
12 Request to the extent that it seeks documents and information already in the possession, custody,  
13 and/or control of Propounding Party. Subject to, and without waiving the foregoing objections,  
14 Responding Party responds as follows:

15 Responding Party made a diligent search and found no documents responsive to this Request  
16 because the responsive documents no longer exist in Responding Party's care, custody, possession,  
17 and/or control.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

19 Responding Party incorporates the preliminary statement and each of the general objections  
20 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
21 objects to this Request as vague and ambiguous as to "constitute, memorialize, concern, mention,  
22 relate to, refer to, and may provide evidence of." Responding Party further objects to this Request on  
23 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiving its aforementioned objections, Responding Party will produce  
25 all non-privileged documents responsive to this Request.

26 **REQUEST FOR PRODUCTION NO. 16:**

27  
28

1 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
2 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
3 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Autymn  
4 Blanck about Plaintiff from December 16, 2015 through the present.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

6 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
7 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
8 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
9 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
10 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
11 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
12 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
13 confidential and also seeks confidential information of third parties. Responding Party further  
14 objects to this Request to the extent that it seeks documents and information already in the  
15 possession, custody, and/or control of Propounding Party.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

17 Responding Party incorporates the preliminary statement and each of the general objections  
18 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
19 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
20 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
21 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiving its aforementioned objections, Responding Party will produce  
23 all non-privileged documents responsive to this Request.

24  
25 **REQUEST FOR PRODUCTION NO. 17:**

26 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
28

1 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Rachael  
2 Hemsli between January 1, 2014 and December 31, 2014.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

4         Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
6 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
7 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
8 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
9 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
10 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
11 confidential and also seeks confidential information of third parties. Responding Party further  
12 objects to this Request to the extent that it seeks documents and information already in the  
13 possession, custody, and/or control of Propounding Party.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

15         Responding Party incorporates the preliminary statement and each of the general objections  
16 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
17 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
18 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
19 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.  
20 Responding Party further objects to this Request to the extent that it seeks documents and  
21 information already in the possession, custody, and/or control of Propounding Party.

22         Subject to and without waiving its aforementioned objections, Responding Party will produce  
23 all non-privileged documents responsive to this Request.

24

25 **REQUEST FOR PRODUCTION NO. 18:**

26         Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,

28

1 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with  
2 Courtenay Lapovsky between January 1, 2014 and December 31, 2014.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

4 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
6 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
7 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
8 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
9 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
10 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
11 confidential and also seeks confidential information of third parties. Responding Party further  
12 objects to this Request to the extent that it seeks documents and information already in the  
13 possession, custody, and/or control of Propounding Party.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

15 Responding Party incorporates the preliminary statement and each of the general objections  
16 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
17 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
18 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
19 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.  
20 Responding Party further objects to this Request to the extent that it seeks documents and  
21 information already in the possession, custody, and/or control of Propounding Party.

22 Subject to and without waiving its aforementioned objections, Responding Party will produce  
23 all non-privileged documents responsive to this Request.

24  
25 **REQUEST FOR PRODUCTION NO. 22:**

26 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,



1 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Aubrey  
2 Fuller from January 1, 2014 through the present.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

4 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
6 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
7 work-product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
8 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
9 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
10 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
11 confidential and also seeks confidential information of third parties. Responding Party further  
12 objects to this Request to the extent that it seeks documents and information already in the  
13 possession, custody, and/or control of Propounding Party. Subject to, and without waiving the  
14 foregoing objections, Responding Party responds as follows:

15 Responding Party made a diligent search and found no documents responsive to this Request  
16 from the time relevant time period of December 15, 2015 through the present, because no such  
17 documents exist.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

19 Responding Party incorporates the preliminary statement and each of the general objections  
20 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
21 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
22 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
23 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.  
24 Responding Party further objects to this Request to the extent that it seeks documents and  
25 information already in the possession, custody, and/or control of Propounding Party.

26 Subject to and without waiving its aforementioned objections, Responding Party will produce  
27 all non-privileged documents responsive to this Request.

1 **REQUEST FOR PRODUCTION NO. 24:**

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
4 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with  
5 Bloomberg from December 16, 2015 through the present.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

7 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
8 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
9 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
10 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
11 4th 214, 217.) Subject to, and without waiving the foregoing objections, Responding Party responds  
12 as follows: Responding Party made a diligent search and found no documents responsive to this  
13 Request because no such documents exist.

14  
15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

16 Responding Party incorporates the preliminary statement and each of the general objections  
17 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
18 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
19 relate to, refer to, and may provide evidence of.” Responding Party objects to this Request to the  
20 extent it is duplicative of Request for Production No. 12.

21 Subject to and without waiving its aforementioned objections, Responding Party will produce  
22 all non-privileged documents responsive to this Request.

23 **REQUEST FOR PRODUCTION NO. 29:**

24 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
25 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
26 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ravi  
27 Agrawal from December 16, 2015 through the present.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

2 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
3 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
4 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
5 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
6 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
7 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
8 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
9 confidential and also seeks confidential information of third parties. Responding Party further  
10 objects to this Request to the extent that it seeks documents and information already in the  
11 possession, custody, and/or control of Propounding Party. Subject to, and without waiving the  
12 foregoing objections, Responding Party responds as follows:

13 Responding Party made a diligent search and found no documents responsive to this Request  
14 because the responsive documents no longer exist in Responding Party’s care, custody, possession,  
15 and/or control.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

17 Responding Party incorporates the preliminary statement and each of the general objections  
18 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
19 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
20 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request to  
21 the extent that it seeks documents and information already in the possession, custody, and/or control  
22 of Propounding Party.

23 Subject to and without waiving its aforementioned objections, Responding Party will produce  
24 all non-privileged documents responsive to this Request.

25  
26 **REQUEST FOR PRODUCTION NO. 30:**

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1 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
2 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
3 mention, relate to, refer to, or may provide evidence of, any and all of YOUR postings and other  
4 activity on Tinder between January 1, 2010 and December 16, 2015.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

6 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
7 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
8 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
9 work-product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
10 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
11 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
12 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
13 confidential and also seeks confidential information of third parties.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

15 Responding Party incorporates the preliminary statement and each of the general objections  
16 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
17 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
18 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
19 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiving its aforementioned objections, Responding Party made a  
21 diligent search and found no documents responsive to this Request because the responsive  
22 documents no longer exist in Responding Party’s care, custody, possession, and/or control.

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1 DATED: December 18, 2023,

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REED SMITH LLP



By: \_\_\_\_\_

Julia Peng  
Nicole S. Soussan Caplan\*  
\*Admitted *Pro Hac Vice*

Attorneys for Defendant

**VERIFICATION**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I have read the following document and know its contents:

**DEFENDANT AYRIES BLANCK'S SUPPLEMENTAL RESPONSES TO  
PLAINTIFF ONETASTE INCORPORATED'S FIRST SET OF REQUESTS FOR  
PRODUCTION**

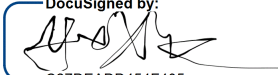
X I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

\_\_\_ I am an authorized agent of \_\_\_\_\_, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

\_\_\_ I am one of the attorneys for \_\_\_\_\_, a party to this action. Such party is absent from the County aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

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

Executed on this \_\_\_\_ day of December, 2023, in Northern Ireland.

DocuSigned by:  
  
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Ayries Blanck

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**PROOF OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 101 Second Street, Suite 1800, San Francisco, CA 94105-3659. On December 18, 2023, I served the following document(s) by the method indicated below:

**DEFENDANT AYRIES BLANCK’S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO ONETASTE INCORPORATED’S REQUEST FOR PRODUCTION, SET ONE**

- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below. I am readily familiar with the firm’s practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.
- by transmitting via email to the parties at the email addresses listed below:

Edwin F. McPherson, Esq. Pierre B. Pine, Esq. MCPHERSON LLP 1900 Avenue of the Stars, 25th Floor Los Angeles, CA 90067 T: (310) 553-8833 F: (310) 553-9233 emcpherson@mcperson-llp.com ppine@mcperson-llp.com	<i>Attorneys for Plaintiff OneTaste Incorporated</i>
---	--

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on December 18, 2023, at San Francisco, California.

  
 \_\_\_\_\_  
 Julia Peng

# **EXHIBIT "C"**



1 Nicole S. Soussan (*pro hac vice*)  
Christopher Donovan (*pro hac vice*)  
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6 Julia Q. Peng (SBN 318396)  
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9 Telephone: +1 415 543 8700  
Facsimile: +1 415 391 8269

10 Attorneys for Defendant  
11 Ayries Blanck

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 FOR THE COUNTY OF LOS ANGELES  
14

15 ONETASTE INCORPORATED,

16 Plaintiff,

17 vs.

18 AYRIES BLANCK,

19 Defendant.  
20  
21  
22

No.: 22STCV33093

**DEFENDANT AYRIES BLANCK'S  
SECOND SUPPLEMENTAL OBJECTIONS  
AND RESPONSES TO ONETASTE  
INCORPORATED'S REQUEST FOR  
PRODUCTION, SET ONE**

Compl. Filed: October 7, 2022  
Trial Date: June 10, 2024  
Disc. Cut-Off: May 10, 2024

Honorable Rupert A. Byrdsong

23 PROPOUNDING PARTY: ONETASTE INC.

24 RESPONDING PARTY: AYRIES BLANCK

25 SET NO: ONE (Second Supplemental)  
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27  
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1 Pursuant to California Code of Civil Procedure sections 2033.010 *et seq.*, Defendant Ayries  
2 Blanck (“Responding Party”) provides the following second supplemental objections and responses  
3 to Plaintiff OneTaste Incorporated’s (“Propounding Party”) Requests for Production of Documents,  
4 Set One, as follows:

5 **Preliminary Statement**

6 Defendant Ayries Blanck has not completed her factual investigation, discovery, or preparation  
7 for trial in this case. The responses contained herein are based only upon such information and  
8 documentation as is presently and reasonably available and specifically known to Ms. Blanck. It is  
9 anticipated that further discovery, independent investigation, legal research, and analysis will supply  
10 additional facts herein. The following response, therefore, is given without prejudice to Ms. Blanck’s  
11 right to produce or rely on additional evidence at trial or in connection with any pretrial proceedings.  
12 Ms. Blanck accordingly reserves the right to amend or supplement this response as discovery in the  
13 case progresses, as new facts develop, and as new information is obtained. The response contained  
14 herein is made in a good faith effort to supply as much factual information and as much specification  
15 of legal contentions as presently known, but should in no way be to the prejudice of Ms. Blanck in  
16 relation to further discovery, research, or analysis.

17 **GENERAL OBJECTIONS**

18 The responses which are set forth below are submitted subject to the objections set forth herein,  
19 and are based upon the current knowledge of Responding Party, and upon such investigation which  
20 was reasonable for Responding Party to undertake under the circumstances of the case. Responding  
21 Party interposes the following general objections to these Requests for Production of Documents.  
22 These objections are made to each and every individual Request, and subpart thereof, and are  
23 incorporated by reference into each of the specific responses which are set forth below.

24 These responses are made solely for the purpose of this specific action. Each answer is subject  
25 to all appropriate objections including, but not limited to, objections concerning competency,  
26 relevancy, materiality, propriety and admissibility, which would require the exclusion of any statement  
27 contained herein if the question were asked of, or any statement contained herein were made by, a

1 witness present and testifying in court. All such objections and grounds are reserved and may be  
2 interposed at the time of trial.

3 Furthermore, Responding Party has not completed her investigation of the facts relating to  
4 this case, has not completed discovery in this action, has not yet received all reports and/or opinions  
5 from its expert witnesses, and has not completed preparation for trial. All of the responses contained  
6 herein are based only upon such information and documents that are immediately available to and  
7 specifically known at this time to Responding Party. As discovery proceeds, information, facts and  
8 witnesses may be discovered that were not identified in response to these interrogatories, but which  
9 may have been responsive to document requests.

10 Additionally, facts and evidence now known may be imperfectly understood, or the  
11 relevance or consequence of such facts and evidence may be imperfectly understood and,  
12 accordingly, such facts and evidence may, in good faith, not be identified in response to these  
13 interrogatories.

14 These responses are thus given without prejudice to Responding Party's right to later use or  
15 produce any such facts or witnesses which Responding Party may later locate, recall or ascertain.  
16 Responding Party accordingly reserves the right to change any and all answers contained herein  
17 accordingly, if a proper supplemental request is made.

18 Responding Party assumes no obligation beyond those imposed by law to voluntarily  
19 supplement or amend these responses to reflect witnesses, facts and evidence following the service of  
20 these responses. In addition, because some of these responses may have been ascertained by  
21 Responding Party's agents, attorneys and/or investigators, Responding Party may not have personal  
22 knowledge of the information from which these responses are derived.

23 **Supplemental Responses to Requests for Production of Documents**

24 Subject to and without waiving the foregoing general objections to the Requests for  
25 Production, each of which is incorporated herein by this reference into each of the responses set  
26 forth below, Responding Party responds as follows:

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

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
4 mention, relate to, refer to, or may provide evidence of, any and all CORRESPONDENCE in which  
5 YOU attached, quoted, or described the AGREEMENT, or any portions thereof, from December 16,  
6 2015 through the present.

7 **RESPONSE TO REQUEST NO. 5:**

8 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
9 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
10 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
11 work-product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
12 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
13 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
14 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
15 confidential and also seeks confidential information of third parties. Subject to, and without waiving  
16 the foregoing objections, Responding Party responds as follows:

17 Responding Party will produce all non-privileged documents responsive to this Request.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

19 Responding Party incorporates the preliminary statement and each of the general objections  
20 listed above, particularly that the Request is vague, ambiguous, and overly broad. Subject to and  
21 without waiving its aforementioned objections, Responding Party made a diligent search and found  
22 no documents responsive to this Request because no such documents exist.

23 **REQUEST FOR PRODUCTION NO. 7:**

24 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
25 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
26 mention, relate to, refer to, or may provide evidence of, any and all statements that YOU have made  
27

1 concerning the AGREEMENT on a social media platform, from December 16, 2015 through the  
2 present.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

4 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
6 it seeks information protected from disclosure by the attorney client privilege and/or attorney work  
7 product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
8 217.) Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

9 Responding Party made a diligent search and found no documents responsive to this Request  
10 because no such documents exist.

11 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

12 Responding Party incorporates the preliminary statement and each of the general objections  
13 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
14 objects to this Request as vague and ambiguous as to “concerning.” Responding Party objects to this  
15 Request as “concerning” is undefined. Responding Party also objects to this Request to the extent  
16 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
17 work product doctrine.

18 Subject to and without waiving its aforementioned objections, Responding Party will produce  
19 all non-privileged documents responsive to this Request.

20 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

21 Responding Party incorporates the preliminary statement and each of the general objections  
22 listed above. Responding Party objects to this Request as vague and ambiguous as to “social media  
23 platform.” Subject to and without waiving its aforementioned objections, Responding Party  
24 produced all non-privileged documents responsive to this Request.

25 **REQUEST FOR PRODUCTION NO. 11:**

26 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,

1 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ruwan  
2 Meepagala from December 16, 2015 through the present.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

4           Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
6 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
7 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
8 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
9 reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without  
10 waiving the foregoing objections, Responding Party responds as follows:

11           Responding Party made a diligent search and found no documents responsive to this Request  
12 because no such documents exist.

13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

14           Responding Party incorporates the preliminary statement and each of the general objections  
15 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
16 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
17 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
18 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

19           Subject to and without waiving its aforementioned objections, Responding Party will produce  
20 all non-privileged documents responsive to this Request.

21 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

22           Responding Party incorporates the preliminary statement and each of the general objections  
23 listed above. Subject to and without waiving its aforementioned objections, Responding Party  
24 produced all non-privileged documents responsive to this Request. Given the duration of time  
25 between December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
26 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

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1 **REQUEST FOR PRODUCTION NO. 12:**

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
4 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ellen  
5 Huet from December 16, 2015 through the present.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

7 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
8 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
9 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
10 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
11 4th 214, 217.) Subject to, and without waiving the foregoing objections, Responding Party responds  
12 as follows:

13 Responding Party made a diligent search and found no documents responsive to this Request  
14 because the responsive documents no longer exist in Responding Party's care, custody, possession,  
15 and/or control.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

17 Responding Party incorporates the preliminary statement and each of the general objections  
18 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
19 objects to this Request as vague and ambiguous as to "constitute, memorialize, concern, mention,  
20 relate to, refer to, and may provide evidence of."

21 Subject to and without waiving its aforementioned objections, Responding Party will produce  
22 all non-privileged documents responsive to this Request. Given the duration of time between  
23 December 2015 and October 2022 (Plaintiff's complaint), Responding Party no longer has  
24 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

25 **REQUEST FOR PRODUCTION NO. 13:**

26 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
27 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
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1 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Peter  
2 Crann from December 16, 2015 through the present.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

4 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
5 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds that  
6 it seeks information protected from disclosure by the attorney client privilege and/or attorney work-  
7 product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App. 4th 214,  
8 217.) Responding Party further objects to this Request on the grounds that it is not reasonably  
9 calculated to lead to the discovery of admissible evidence. Responding Party further objects to this  
10 Request to the extent that it seeks documents and information already in the possession, custody,  
11 and/or control of Propounding Party. Subject to, and without waiving the foregoing objections,  
12 Responding Party responds as follows:

13 Responding Party made a diligent search and found no documents responsive to this Request  
14 because the responsive documents no longer exist in Responding Party's care, custody, possession,  
15 and/or control.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

17 Responding Party incorporates the preliminary statement and each of the general objections  
18 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
19 objects to this Request as vague and ambiguous as to "constitute, memorialize, concern, mention,  
20 relate to, refer to, and may provide evidence of." Responding Party further objects to this Request on  
21 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiving its aforementioned objections, Responding Party will produce  
23 all non-privileged documents responsive to this Request.

24 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

25 Responding Party incorporates the preliminary statement and each of the general objections  
26 listed above. Subject to and without waiving its aforementioned objections, Responding Party  
27 produced all non-privileged documents responsive to this Request. Given the duration of time



1 between December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
2 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

3 **REQUEST FOR PRODUCTION NO. 16:**

4 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
5 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
6 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Autymn  
7 Blanck about Plaintiff from December 16, 2015 through the present.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

9 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
10 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
11 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
12 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
13 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
14 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
15 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
16 confidential and also seeks confidential information of third parties. Responding Party further  
17 objects to this Request to the extent that it seeks documents and information already in the  
18 possession, custody, and/or control of Propounding Party.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

20 Responding Party incorporates the preliminary statement and each of the general objections  
21 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
22 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
23 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
24 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

25 Subject to and without waiving its aforementioned objections, Responding Party will produce  
26 all non-privileged documents responsive to this Request. Given the duration of time between  
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1 December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
2 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

3 **REQUEST FOR PRODUCTION NO. 17:**

4 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
5 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
6 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Rachael  
7 Hemi between January 1, 2014 and December 31, 2014.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

9 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
10 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
11 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
12 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
13 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
14 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
15 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
16 confidential and also seeks confidential information of third parties. Responding Party further  
17 objects to this Request to the extent that it seeks documents and information already in the  
18 possession, custody, and/or control of Propounding Party.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

20 Responding Party incorporates the preliminary statement and each of the general objections  
21 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
22 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
23 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
24 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.  
25 Responding Party further objects to this Request to the extent that it seeks documents and  
26 information already in the possession, custody, and/or control of Propounding Party.

1 Subject to and without waiving its aforementioned objections, Responding Party will produce  
2 all non-privileged documents responsive to this Request.

3 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

4 Responding Party incorporates the preliminary statement and each of the general objections  
5 listed above. Subject to and without waiving her aforementioned objections, Responding Party  
6 produced all non-privileged documents responsive to this Request. Given the duration of time  
7 between December 2015 and October 2022 (Plaintiff's complaint), Responding Party no longer has  
8 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

9 **REQUEST FOR PRODUCTION NO. 18:**

10 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
11 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
12 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with  
13 Courtenay Lapovsky between January 1, 2014 and December 31, 2014.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

15 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
16 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
17 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
18 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
19 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
20 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
21 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
22 confidential and also seeks confidential information of third parties. Responding Party further  
23 objects to this Request to the extent that it seeks documents and information already in the  
24 possession, custody, and/or control of Propounding Party.

25 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

26 Responding Party incorporates the preliminary statement and each of the general objections  
27 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
28

1 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
2 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
3 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.  
4 Responding Party further objects to this Request to the extent that it seeks documents and  
5 information already in the possession, custody, and/or control of Propounding Party.

6 Subject to and without waiving its aforementioned objections, Responding Party will produce  
7 all non-privileged documents responsive to this Request.

8 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

9 Responding Party incorporates the preliminary statement and each of the general objections  
10 listed above. Subject to and without waiving its aforementioned objections, Responding Party  
11 produced all non-privileged documents responsive to this Request. Given the duration of time  
12 between December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
13 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

14 **REQUEST FOR PRODUCTION NO. 22:**

15 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
16 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
17 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Aubrey  
18 Fuller from January 1, 2014 through the present.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:.**

20 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
21 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
22 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
23 work-product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
24 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
25 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
26 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
27 confidential and also seeks confidential information of third parties. Responding Party further

28



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

2 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
3 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
4 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
5 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
6 4th 214, 217.) Subject to, and without waiving the foregoing objections, Responding Party responds  
7 as follows: Responding Party made a diligent search and found no documents responsive to this  
8 Request because no such documents exist.

9 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

10 Responding Party incorporates the preliminary statement and each of the general objections  
11 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
12 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
13 relate to, refer to, and may provide evidence of.” Responding Party objects to this Request to the  
14 extent it is duplicative of Request for Production No. 12.

15 Subject to and without waiving its aforementioned objections, Responding Party will produce  
16 all non-privileged documents responsive to this Request. Given the duration of time between  
17 December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
18 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

19 **REQUEST FOR PRODUCTION NO. 29:**

20 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
21 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
22 mention, relate to, refer to, or may provide evidence of, YOUR COMMUNICATIONS with Ravi  
23 Agrawal from December 16, 2015 through the present.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

25 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
26 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
27 that it seeks information protected from disclosure by the attorney client privilege and/or attorney

1 work-product doctrine. (*See Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
2 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
3 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
4 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
5 confidential and also seeks confidential information of third parties. Responding Party further  
6 objects to this Request to the extent that it seeks documents and information already in the  
7 possession, custody, and/or control of Propounding Party. Subject to, and without waiving the  
8 foregoing objections, Responding Party responds as follows:

9         Responding Party made a diligent search and found no documents responsive to this Request  
10 because the responsive documents no longer exist in Responding Party’s care, custody, possession,  
11 and/or control.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

13         Responding Party incorporates the preliminary statement and each of the general objections  
14 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
15 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
16 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request to  
17 the extent that it seeks documents and information already in the possession, custody, and/or control  
18 of Propounding Party.

19         Subject to and without waiving its aforementioned objections, Responding Party will produce  
20 all non-privileged documents responsive to this Request.

21 **SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

22         Responding Party incorporates the preliminary statement and each of the general objections  
23 listed above. Subject to and without waiving its aforementioned objections, Responding Party  
24 produced all non-privileged documents responsive to this Request. Given the duration of time  
25 between December 2015 and October 2022 (Plaintiff’s complaint), Responding Party no longer has  
26 possession, custody, or control of certain electronics she used prior to the filing of this lawsuit.

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1 **REQUEST FOR PRODUCTION NO. 30:**

2 Any and all DOCUMENTS and COMMUNICATIONS, including, but not limited to,  
3 ELECTRONICALLY STORED INFORMATION, that are, constitute, memorialize, concern,  
4 mention, relate to, refer to, or may provide evidence of, any and all of YOUR postings and other  
5 activity on Tinder between January 1, 2010 and December 16, 2015.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

7 Responding Party objects to this Request on the grounds that it is vague, ambiguous,  
8 overbroad, and unduly burdensome. Responding Party also objects to this Request on the grounds  
9 that it seeks information protected from disclosure by the attorney client privilege and/or attorney  
10 work-product doctrine. (See *Nacht v. Lewis Architects, Inc. v. Superior Court* (1996) 47 Cal. App.  
11 4th 214, 217.) Responding Party further objects to this Request on the grounds that it is not  
12 reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to  
13 this Request to the extent it seeks disclosure of confidential information of Responding Party that is  
14 confidential and also seeks confidential information of third parties.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

16 Responding Party incorporates the preliminary statement and each of the general objections  
17 listed above, particularly that the Request is vague, ambiguous, and overly broad. Responding Party  
18 objects to this Request as vague and ambiguous as to “constitute, memorialize, concern, mention,  
19 relate to, refer to, and may provide evidence of.” Responding Party further objects to this Request on  
20 the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

21 Subject to and without waiving its aforementioned objections, Responding Party made a  
22 diligent search and found no documents responsive to this Request because the responsive  
23 documents no longer exist in Responding Party’s care, custody, possession, and/or control.

24 DATED: May 24, 2024

25 REED SMITH LLP

26  
27 By: 

28 \_\_\_\_\_  
Julia Peng



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Nicole S. Soussan Caplan\*  
Christopher Donovan\*  
\*Admitted *Pro Hac Vice*  
  
Attorneys for Defendant

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**PROOF OF SERVICE**

*OneTaste Inc. vs Ayries Blanck*  
Los Angeles Superior Court, Case No. 22STCV33093


I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is REED SMITH LLP, 101 Second Street, Suite 1800 San Francisco, CA 94105-3659. On **May 24, 2024**, I served the following document(s) by the method indicated below:

**DEFENDANT AYRIES BLANCK’S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO ONETASTE INCORPORATED’S REQUEST FOR PRODUCTION, SET ONE**

- VIA U.S. MAIL.** By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below. I am readily familiar with the firm’s practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.
- VIA ELECTRONIC SERVICE.** By transmitting via email to the parties at the email addresses listed below.
- VIA OVERNIGHT DELIVERY.** By placing the document(s) listed above in a sealed envelope(s) and consigning it to an express mail service for guaranteed delivery on the next business day following the date of consignment to the address(es) set forth below.
- VIA COURT'S ELECTRONIC SERVICE PROVIDER.** Pursuant to Local Rule, I caused this document to be electronically filed with the Clerk of the Court using the Court's E-Filing System, which sent notification of such filing and service to the interested parties appearing on the electronic service list for the above-referenced case.

Edwin F. McPherson Email: <a href="mailto:emcpherson@mcpherson-llp.com">emcpherson@mcpherson-llp.com</a> Pierre B. Pine Email: <a href="mailto:ppine@mcpherson-llp.com">ppine@mcpherson-llp.com</a> 1900 Avenue of the Stars 25th Floor Los Angeles, CA 90067 Tel: (310) 553-8833 Fax: (310) 553-9233  <i>Attorneys for Plaintiff, OneTaste Inc.</i>	
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I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **May 24, 2024**, at San Francisco, California.

  
\_\_\_\_\_  
Julia Q. Peng

# **EXHIBIT "D"**

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**From:** Ayries Blanck [ayries.blanck@gmail.com]  
**Sent:** 11/10/2022 6:22:35 PM  
**To:** ayriesblanc@gmail.com  
**Subject:** Fwd: Dear Ayries <3 love Louisa

----- Forwarded message -----

**From:** Louisa West <louloujanewestx@gmail.com>  
**Date:** Thu, Oct 27, 2022 at 5:15 PM  
**Subject:** Dear Ayries <3 love Louisa  
**To:** <ayries.blanck@gmail.com>

Dearest Ayries,

I want to reach out to tell you some things that have been going on, which I want to connect with you about, and at least come clean so that I feel in integrity with our friendship.

First of all, I told OneTaste's lawyer - and I signed a statement saying - that you told me you broke the NDA. I don't know if you remember telling me you broke it, we were in a tent at Oregon Eclipse. I am very sad about this whole situation and that I had to do that. I do not want you to get in trouble, and OneTaste's lawyers promised me that they would not go after you in retaliation with this information, that they would only defend themselves.

More importantly, I want to reach out and say that I am your friend and I am your sister, even if we haven't spoken for years. I am worried about you. I know what it's like to be angry and hurt with people you once loved, to regret decisions you made, to feel taken advantage of. And I honor your feelings. I love you. I don't know how much of what the media is reporting is coming from you - but I know at least some of it. And darling beautiful badass woman, you don't need to keep doing this. You can heal from this. You know that the people in OneTaste still love you? They still love you crazy madly deeply. You're Ayries, how could they not?

Sweetheart I wish you could feel the love in my voice but I couldn't find a way to send you a voice note. So this will have to suffice. The FBI is too far. It's not fair, it's not right, crimes were not committed. Nicole is not a criminal. Neither is Rachel. They all agree that things were far from perfect within the organization, but it is unfair that they are being subjugated to criminal accusations.

I invite you to talk to me, please, as a friend. If you so desire I will not say a word to anyone about our conversation. But I don't know darling, it's worrying me, the whole thing, the way these lies have been spun. It's not right. We need to clean this up. There is already enough pain in the world.

Let me help you help me help all of us <3 please  
Love you always,  
Your fiery sister

Louisa

PS. Whatsapp & signal : +51 976 288 487

EXH. D

BLANCK\_0000459

# **EXHIBIT "E"**

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**From:** Ayries Blanck [ayries.blanck@gmail.com]  
**Sent:** 11/10/2022 6:23:51 PM  
**To:** ayriesblanc@gmail.com  
**Subject:** Fwd: Hi friend

----- Forwarded message -----

**From:** Summer Engman <summerengman@gmail.com>  
**Date:** Sat, Oct 29, 2022 at 12:05 AM  
**Subject:** Hi friend  
**To:** Ayries Blanck <ayries.blanck@gmail.com>

Hey Ayries,

There is a lot going on that I feel that I need to fill you in on. In the last couple of weeks I have become aware that the footage that was sold to Netflix likely included a lot of my time in OT and that I might be in the documentary. Appearing in this documentary would go against my personal interests and could really jeopardize the business I've built... especially seeing the trailers come out under the genre of True Crime. Being associated with an allegedly criminal organization is damaging to me and hundreds of other people who have moved on and created lives, families, and businesses on the heels of our onetaste experiences.

So I have signed the petition to Netflix to cease and desist, and I have been talking to a lot of people and have become willing and ready to talk to the media as well. Because so far what has been depicted in the media feels false. The allegations of rape and sexual assault... I never heard about them before they came out in the media. For all the years you and I have been friends, you never once mentioned them to me. I haven't pressed you about it because I haven't paid particular attention and didn't much care, but the stakes are higher than ever now. And I don't want to see people charged for crimes that did not happen. I care about the truth.

I had a conversation yesterday with Louisa and Maya because during the time of the alleged events, the time leading up to your departure, and the time after, I think the three of us together have a pretty well rounded perspective. We were all close to you during different parts of the timeline and we spoke in order to try and fill each other in, understand what we were missing, etc. What we found in speaking to each other is that we all three had heard basically the same story from you, and that you'd never told any of us about the serious allegations covered in the media.

In the absence of communication with you, the best I can do is to look at as much evidence as possible and try to discern the truth, relying predominantly on my own experience and observations.

I wanted to be the one to tell you that I am speaking out on this. I want you to know that I am not against you. I've always had your back. But I don't think these things happened as reported and I think that leaving these allegations unchecked has been hugely irresponsible on your part. There are grave consequences for allegations of this nature. So I can't just stand by. It's gotten out of control...

And the last thing I will say is that I have become privy to the behind the scenes at onetaste and they have spent the last several years organizing everything they have (which is a LOT) into chronological order, and aligning it all with the timeline of events as portrayed in the media. They have talked to countless people who were there during that time. And all of this evidence combined makes it crystal clear that the allegations are simply false. And in order to prove this they are going to have to share a lot of material that I promise you... you do not want coming out. It's devastating, Ayries. I do not want you to go through this. Yes, I have personal interest in not

having this Netflix Doc come out, but I think you especially should be doing everything in your power to prevent the media storm that is about to sweep you up and take over your life.

Netflix has made it clear that they are taking all the past media pieces as established fact and that they will not vet any of the supporting evidence. So if any of those past allegations are retracted, Netflix has to withdraw or re-edit. And this avoids a flurry of inevitably ensuing lawsuits of which you will no doubt be a central figure.

I'm here if you want to talk. Happy to do anything I can to help. I love you.

**Summer Engman**

☎ (415) 216-8775

# **EXHIBIT "F"**





**From:** Ayries Blanck [ayries.blanck@gmail.com](mailto:ayries.blanck@gmail.com)  
**Subject:** Re: Today's Affiliate Call - 1:30pmPT  
**Date:** January 11, 2015 at 12:33 PM  
**To:** Justine Dawson [justine.dawson@onetaste.us](mailto:justine.dawson@onetaste.us)  
**Cc:** [otaffiliates](mailto:otaffiliates) [affiliates@onetaste.us](mailto:affiliates@onetaste.us)

---

please remove me from email list.

Warmly,  
Ayries

On Thu, Jan 8, 2015 at 2:28 PM, Justine Dawson <[justine.dawson@onetaste.us](mailto:justine.dawson@onetaste.us)> wrote:

Hello Community Leaders,

Happy New Year!

Today, we start back on our weekly calls at 1:30pmPT. It will be great to have you all on to reconnect and plug into orgasm for the new year. I want to encourage you to have at least one representative from your community on the call EVERY THURSDAY as we regularly share important information and updates that I don't want you to miss out on. It's one hour a week to get together, synch up and get what we need to hold our businesses well.

Today Marcus Ratnathicam, leader of the LA affiliate, will be joining us to share a detailed orientation to I OM meetings. He'll share :

- why we do I OM Meetings - the intention and purpose
- The logistics of setting up and promoting meetings to the public
- How to run the meetings themselves, step by step- how to hold the container
- How I OM Meetings are changing our OneTaste community culture

After the call today, I will be sending out the full I OM script so you can begin them in your community.

Message me if you need any help getting you or a team member on the call.

Love you all.

xo

Justine Dawson  
OneTaste  
[+1 415 730 8320](tel:+14157308320)

EXH. F

# **EXHIBIT "G"**



Summer, Rachael, Dana and 4 others

Generated by Ayries Blanc on Wednesday, November 15, 2023 at 8:09 AM UTC-05:00

Contains data from January 1, 2004 at 12:00 AM to November 14, 2023 at 7:52 AM

Participants: Summer Hokulani, Rachael Hemi, Ayries Blanc, Dana Lawrence, Brenda Fredericks, Maya Gilbert, Marcus Ratnathicam and Marissa Ward

Group Invite Link: Off

Facebook user

A contact left the group.

Aug 05, 2014 2:46:35pm

Marie-Elizabeth Mali

A contact left the group.

Aug 05, 2014 12:38:54pm

Rachael Hemi

DONE!!!!

Aug 04, 2014 6:58:18pm

Brenda Fredericks

♥♥♥Marissa!!!

Aug 04, 2014 3:41:53pm

Marissa Ward

And thank you Ayries for helping me get the event announced! ♥

Aug 04, 2014 3:34:46pm

Marissa Ward

No worries, I'll be leading every week so come another time.

Aug 04, 2014 3:34:24pm

Brenda Fredericks

My pleasure. Wish I could really come!!!

Aug 04, 2014 3:31:43pm

Marissa Ward

Thanks for RSVP'ing to the BK turnon too Brenda. I need one more "Yes" for the group to announce the event! <http://www.meetup.com/1001ers/events/198935802/>

How often do we get an opportunity to be real with each other? It can feel unsafe, inappropriate, or unwelcome by those around you. Instead, imagine meeting new people in an environment where people f

<http://www.meetup.com/1001ers/events/198935802/>

Aug 04, 2014 3:28:36pm

Ayries Blanc

zzzt

Aug 04, 2014 3:26:54pm

Brenda Fredericks

😬

Aug 04, 2014 3:22:49pm

Maya Gilbert

:)

Aug 04, 2014 3:22:30pm

Maya Gilbert

yes

Aug 04, 2014 3:22:28pm

Brenda Fredericks

so you want me to RSVP yes?

Aug 04, 2014 3:22:24pm

Maya Gilbert

but for getting new ladies to come we all just RSVP yes so that we get as many people RSVPing

Aug 04, 2014 3:05:24pm

Maya Gilbert

it's good for us to know if you are or arent going

Aug 04, 2014 3:04:37pm

Maya Gilbert

yes

Aug 04, 2014 3:04:21pm

Brenda Fredericks

So to be clear...you want me to RSVP as a yes or a no? I cannot go.

Aug 04, 2014 3:03:52pm

Ayries Blanc

ya RSVP!!

Aug 04, 2014 2:47:05pm

Maya Gilbert

RSVP to any that you can anyways so that more ladies from those meetups come

Aug 04, 2014 2:43:14pm

Maya Gilbert

zzzt!!!

Aug 04, 2014 2:42:55pm

Brenda Fredericks

can't go to either one! have fun beasties! Sending my orgasm

Aug 04, 2014 2:42:24pm

Marissa Ward

Please RSVP to this too! <http://www.meetup.com/1001ers/events/198935802/>

How often do we get an opportunity to be real with each other? It can feel unsafe, inappropriate, or unwelcome by those around you. Instead, imagine meeting new people in an environment where people f

<http://www.meetup.com/1001ers/events/198935802/>

Aug 04, 2014 12:33:30pm

Ayries Blanc

woohoo

Aug 04, 2014 12:30:07pm

Marissa Ward

done :)

Aug 04, 2014 12:29:48pm

Ayries Blanc

oops! I added marcus on accident!

Aug 04, 2014 12:28:00pm

Rachael Hemi

DONE!!!!

Aug 04, 2014 12:27:36pm

Maya Gilbert

A contact added participants.

Aug 04, 2014 12:27:28pm

Maya Gilbert

yes!

Aug 04, 2014 12:26:50pm

Ayries Blanc

PLS RSVP!!!

Monday, August 4, 2014 8:00 PM @ Friends In Deed — Join us for a very special TurnON event! ... Women's Only! Through structured communication games, you get to connect with other women and talk about desire and sex through three communication games. See an example of the feeling of our events on ...

[http://www.meetup.com/1001ers/events/198934792/?gj=fbsd\\_es&a=fbsd\\_event\\_sugg&rv=fbsd\\_es&from\\_fb=true](http://www.meetup.com/1001ers/events/198934792/?gj=fbsd_es&a=fbsd_event_sugg&rv=fbsd_es&from_fb=true)

IP Address: 108.176.63.146

Aug 04, 2014 12:26:45pm

# **EXHIBIT "H"**

The screenshot shows a Google Docs interface with a document titled "Journals". A "Document details" pop-up window is centered over the document text. The pop-up window contains the following information:

- Location:** Onetaste
- Owner:** autymn blanc
- Modified:** Mar 9, 2023 by Ares M
- Created:** May 4, 2022

The document text visible behind the pop-up includes:

**Series One: Darkness**

**January 15th**

I officially left on January first of insanity it's now over. A gr type and I am only able to ea around me. Fearing at any m The logical part of me knows not logical creatures. I do not will find over the coming mor

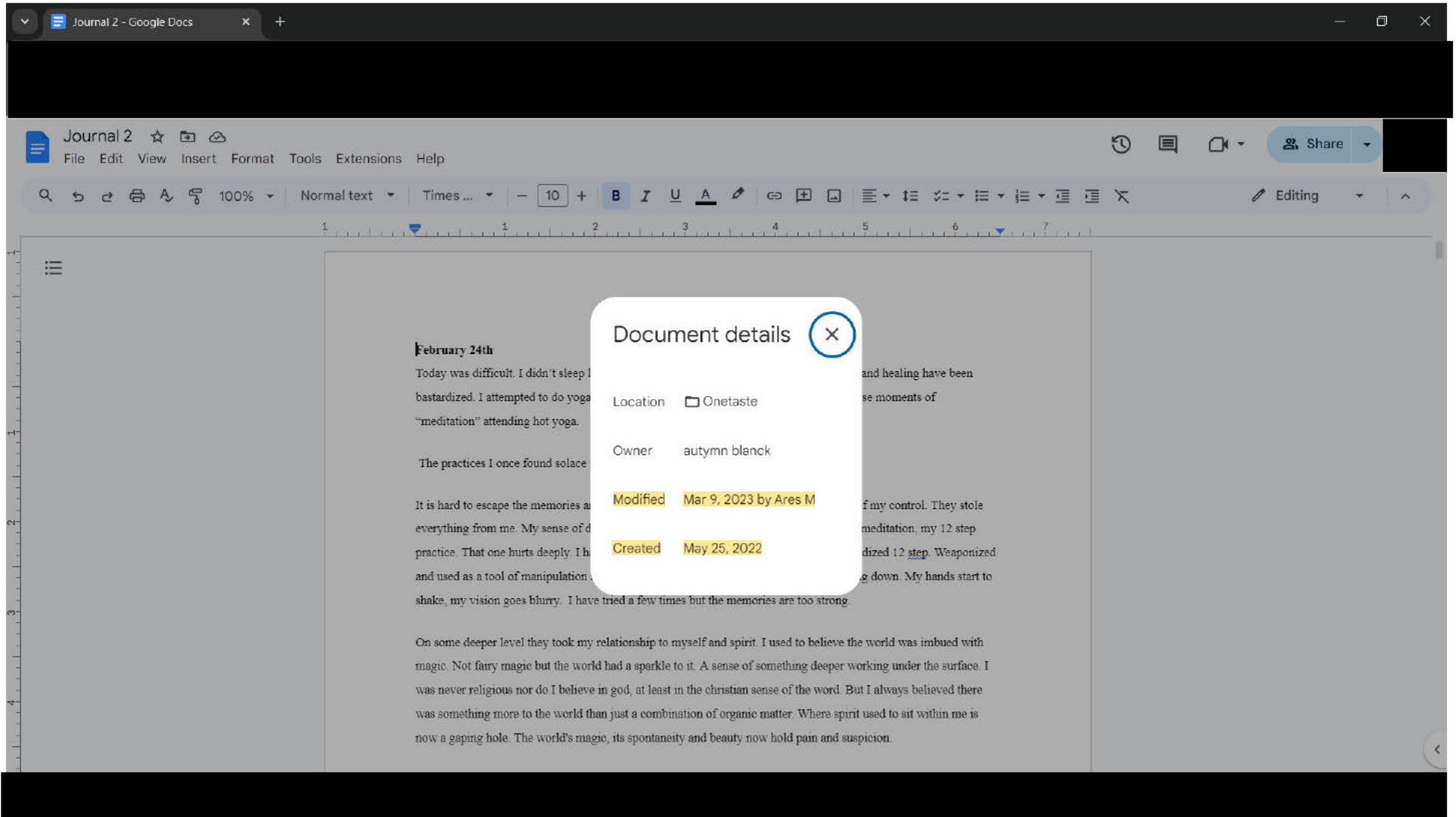
I left New York. I was so scar find another way to pull me b experience through the rose c my rage but right now I am only numb.

I have returned to Washington state to my childhood home in eastern Washington with my godmother. She lives in a remote part of the state surrounded by wilderness. There is no internet connection or cell phone service. Her address is not known by anybody and the only person who I told where I was going was my sisters and father. Here, for the first time in a long time, I feel safe. Nobody can get me here. Nobody will be able to find me and trap me. He will not be able to find nor harm me. Finally, I am free.

It is nice to just have silence. My own bed. My own shower. No more sleeping on the floor, no

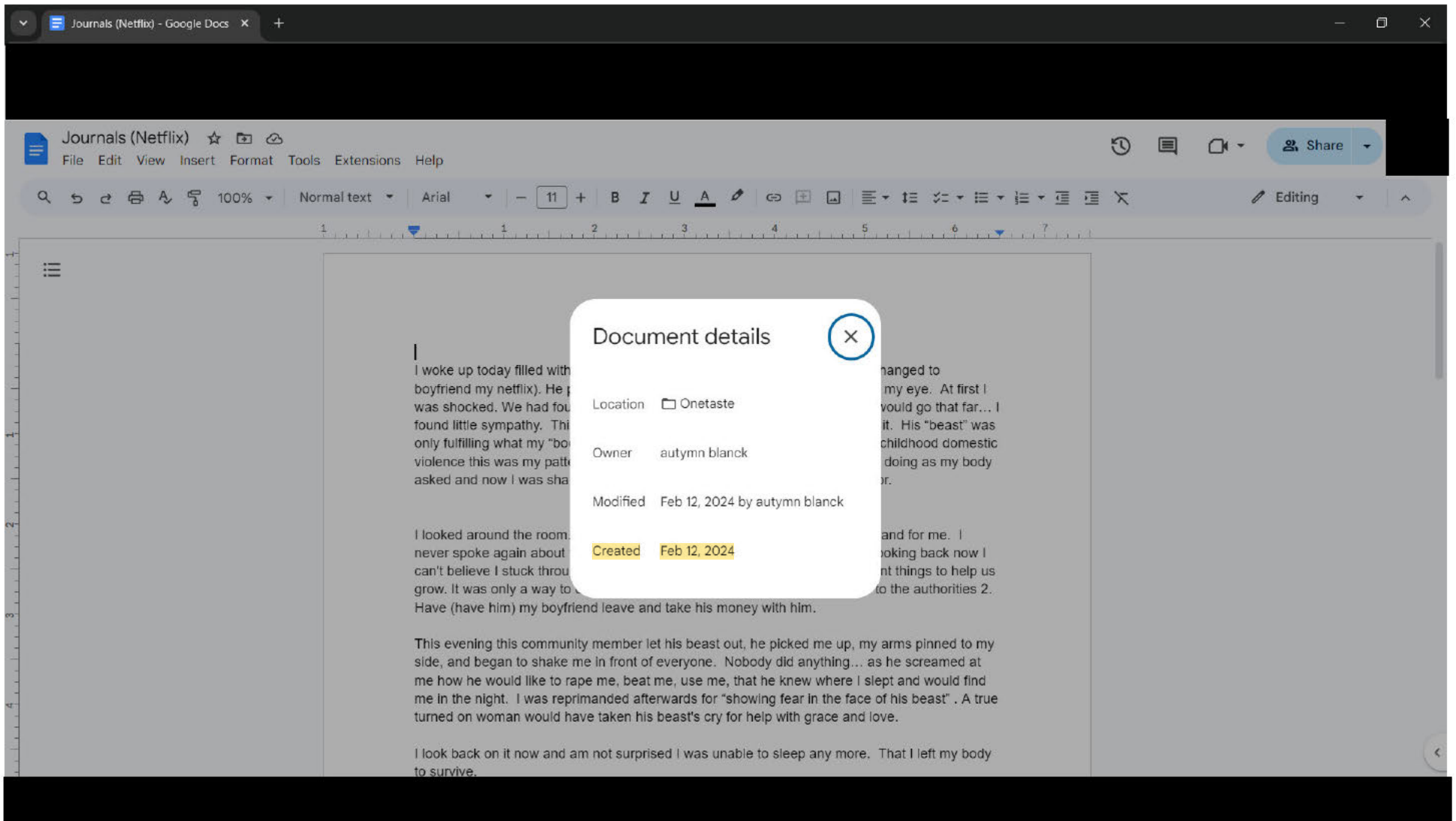
EXH. H

Autymn B. - 148



EXH.H

Autymn B. - 149



EXH. H

Autymn B. - 150



# **EXHIBIT "I"**

**Ayries:**

Heading to bunker

To fuck then hive

We make meetip tonight

**Maya Gilbert:**

Yah!!!

Who fucking!

**Ayries:**

Paul ⚡ 😊

**Maya Gilbert:**

🤔 😊

**Ayries:**

I just can't resist nats orgasm p

**Maya Gilbert:**

LOL

Ayries Blanc

talk

2 results

Close

2/6/14 11:24 AM

Wanna do some monogamy training with Ravi?! I found the perfect exercise

Yeah, She Squats

3/4/14 6:03 PM

im so excited to see you peter!

and haha

ravi and i are the polar opposite of monogomy

i havent had sex with him in over a month

8/4/14 6:33 PM

YES!!

i have had more sex in the last two weeks than i have in my entire life

sooo good

I am looking forward to you and having sex with you too 😊

Yay

To: Ayries Blank ▾



6/6/14, 6:22 AM

Hey :)

hi

hows it going?

Pretty good. I had something to ask you about regarding Ravi and playing a game

ok what's up?

Well a few weeks ago I did a scene with Om and what I learned from it is I have never fully surrendered to a man in sex, or willingly in life either. There is always an under the radar fuck you you can't have my pussy. And I contract, tighten and push them out to keep them out. I have never let myself be fucked, or just let my pussy be fucked

And a few days ago Ravi and I had sex and I asked him to fuck me

With all his manly desire and to see my pussy as what it is, a vessels for taking in and fucking.

To fuck it like that was it's only purpose was to be fucked and filled

And then the next morning I omed with Ryan and Ravi and I did the same thing I let my self be "fucked" in the om

And it was amazing, there was so much release and pain and pleasure.

And the game I wanted to design was having Ravi plus five other men iust fuck me. for no other our pair but to fuck me.

To: Ayries Blank ▾



procedure.

And the game I wanted to design was having Ravi plus five other men just fuck me, for no other our pair but to fuck me. Like really fuck me

Even if it hurt or I hated it. And to allow myself to surrender and look under what I perceived as pain.

And I'm having a hard time thinking of a way this idea will go over well with Ravi

Fuck me at different times not all at once

I've only had sex with two ppl since we have been open and both times were quite a fight with a lot of chaos drama and wreckage

Not now, in a while when all the affiliate stuff has settled

Hi. That was my thought and I didn't know how to say it

I think for both of you take it slow

You don't want to force anything.

Guh that's the lesson of my day! Slow down and feel the electricity in the really really subtle stuff I usually buzz over

Maybe I just said that whole thing so I could share that with you

I get you like the prying open. And be gentle with yourself

Yeah we keep talking

:)

Chat Window opened on 2014-07-25 16:57:52

16:57:52 Courtenay Lapovsky: ⚡ ⚡

16:06:40 Courtenay Lapovsky: ⚡ ⚡

18:48:48 Ayries: Are you ok with me having sex with KoZer tonight

18:50:56 Courtenay Lapovsky: After I'm done with him!

18:50:56 Courtenay Lapovsky: If he's got any left!

18:50:56 Ayries: Haha! Yes!!!

ONETASTE 000398

EXH. I

Chat Window opened on 2014-08-10 08:28:48  
08:28:48 Ayries: We having woman's group tonight?  
08:30:56 Maya Gilbert: When you hear from Kay?  
08:30:56 Ayries: I'm calling her now  
08:30:56 Maya Gilbert: ☐  
08:30:56 Ayries: And Kimberly  
08:30:56 Maya Gilbert: ♥  
10:09:04 Maya Gilbert: Where are you!  
10:11:12 Ayries: Dinner with ravis family  
10:11:12 Ayries: We have had it planned for a while!  
10:21:52 Maya Gilbert: Oh  
10:21:52 Maya Gilbert: Fine!!!  
12:27:44 Ayries: Ok maya! Tonight I just need to slow down and ask for what I desire whenever it starts to go to fast  
12:27:44 Maya Gilbert: Hm?  
12:29:52 Ayries: When having sex  
12:29:52 Ayries: With Tristan  
12:36:16 Maya Gilbert: OH!!!  
12:36:16 Maya Gilbert: YAAAAA  
12:36:16 Ayries: Yes!!!  
12:36:16 Ayries: =3=3==H=H====y=y  
13:50:56 Ayries: Oh no! He got address wrong and went to Brooklyn!!  
13:50:56 Maya Gilbert: OMG  
13:50:56 Maya Gilbert: Hahaha  
13:50:56 Ayries: I know!!!  
13:50:56 Ayries: Dear god  
13:50:56 Ayries: When you home?  
13:55:12 Maya Gilbert: Seeing about getting sex so I'll know more in the next 30 mins  
13:55:12 Ayries: Haha  
13:55:12 Ayries: You home tonight though?  
13:55:12 Ayries: And be here for practice in the am  
13:57:20 Maya Gilbert: Ya  
14:35:44 Ayries: Maya  
14:35:44 Ayries: I'm tired  
14:35:44 Maya Gilbert: Lol  
14:35:44 Ayries: I don't wanna have sex anymore  
14:35:44 Maya Gilbert: What do you want  
14:35:44 Ayries: To be few  
14:35:44 Ayries: Free  
14:35:44 Ayries: And sell stuff!  
14:37:52 Ayries: And I sleepy  
14:37:52 Ayries: And feeling kinda down  
14:37:52 Maya Gilbert: What's your desire  
14:37:52 Maya Gilbert: Like it doesn't have to be full sex  
14:37:52 Maya Gilbert: That probably will be nice  
14:37:52 Ayries: Ya  
14:37:52 Ayries: All my barbarians coming up!  
14:37:52 Ayries: And I'm sleepy  
14:37:52 Ayries: And miss Ravi  
14:40:00 Ayries: And feel grumpy  
14:40:00 Ayries: Blah blah blah  
14:40:00 Maya Gilbert: You just say  
14:40:00 Maya Gilbert: Brain  
14:40:00 Maya Gilbert: CHTTT  
14:40:00 Ayries: Brain CCHHHTTT  
14:40:00 Maya Gilbert: OMG I has this moment with Shane last night  
14:40:00 Maya Gilbert: Where I was like we gotta do this thing or imma pick a fight  
14:40:00 Maya Gilbert: I could hear the fight voices in my head  
14:40:00 Maya Gilbert: And I was like  
14:40:00 Maya Gilbert: No !  
14:40:00 Maya Gilbert: Not gonna happen!  
14:42:08 Ayries: YES!  
14:42:08 Ayries: That's right  
14:42:08 Ayries: Aaahhhh  
14:42:08 Maya Gilbert: I'm wAiting to hear back from my sex too!  
14:42:08 Maya Gilbert: A boy I've known since I was 7!  
14:42:08 Ayries: OMG he is here!  
14:42:08 Maya Gilbert:  
14:42:08 Maya Gilbert: See!!  
14:42:08 Maya Gilbert: Get it!!  
14:42:08 Ayries: Aaaaahhhhh  
15:48:16 Ayries: Well that was a good fuck  
15:48:16 Maya Gilbert: =====  
15:48:16 Maya Gilbert: OMG  
15:48:16 Maya Gilbert: Tell me!!!  
15:50:24 Ayries: He has a big cock  
15:50:24 Ayries: And he adjust well  
15:50:24 Maya Gilbert: So hot  
15:50:24 Ayries: Like when given an adjust ment  
15:50:24 Ayries: He takes it in and can actually adjust in real time  
15:50:24 Maya Gilbert: Yaaayy

Chat Window opened on 2014-08-13 17:10:40

17:10:40 Ayries: You are amazing love!!

17:12:48 Ayries: ♥

18:23:12 Courtenay Lapovsky: Tristan is cute!

18:23:12 Ayries: OMG I know!!!

18:23:12 Ayries: Have sex with him!!

18:23:12 Ayries: He has a big cock

18:25:20 Courtenay Lapovsky: We sitting next to each other in the backseat

18:25:20 Courtenay Lapovsky: Probably inappropriate I have sex with him!

18:27:28 Courtenay Lapovsky: In the backseat

18:29:36 Ayries: Nope!! Not at all!

18:29:36 Ayries: Have sex at some point he beasty!!

18:33:52 Courtenay Lapovsky: When all four of us are in a motel room?!

18:59:28 Ayries: Yes

19:01:36 Courtenay Lapovsky: Haha

19:59:12 Ayries: Have sex in the bathroom!

20:24:48 Ayries: Or have everybody else go into the bathroom

21:22:24 Courtenay Lapovsky: Haha



Chat Window opened on 2014-09-20 10:24:00

10:24:00 Ayries: What are the ethics rules around me and Jamarr having sex tonight if him and I have never hooked up before and mastery is now over

10:24:00 Justine Dawson: Yeah it's fine

10:28:16 Ayries: Woohoo!!!

Chat Window opened on 2014-09-26 15:04:48

15:04:48 ms.joannav@me.com: That's good

15:04:48 ms.joannav@me.com: May I ask a question?

15:06:56 Ayries: Yes

15:09:04 ms.joannav@me.com: How was sex with Ryan?

15:28:16 Ayries: Beastier than it has been in the past. And then he stuck it in my butt and it was a lot of sensation and I got right

15:28:16 Ayries: Tight

15:28:16 ms.joannav@me.com: Thank you 🙏🙏

15:34:11 Ayries: Are you guys back together

15:35:48 ms.joannav@me.com: Not at all

15:36:02 ms.joannav@me.com: And I heard you all had sex so I was curious 🙏🙏

15:36:11 ms.joannav@me.com: I thought maybe I wouldn't even ask

16:57:52 Ayries: Oh!

16:57:52 Ayries: Sex with Ryan is good. He can pick me up

17:00:00 ms.joannav@me.com:

17:00:00 ms.joannav@me.com: Hot!

Chat Window opened on 2014-09-30 08:42:56

08:42:56 Ayries: How are you doing  
08:42:56 kenanwangl@gmail.com: I'm doing pretty well happy and a little sensitive  
09:46:56 Ayries: Did sales call happen?  
09:55:28 kenanwangl@gmail.com: Our wedding started late  
09:55:28 kenanwangl@gmail.com: I'm not sure  
13:50:08 Ayries: Tarot card!  
13:50:08 kenanwangl@gmail.com: :-)  
13:52:16 kenanwangl@gmail.com: Chris will bring to you or I can bring during taboo  
14:05:04 Ayries: Kenan!!  
14:17:52 kenanwangl@gmail.com: :-)  
14:30:40 Ayries: KENAN!!  
17:36:16 kenanwangl@gmail.com: Ayries 📄 📄  
17:38:24 Ayries: 📄 📄 📄 📄  
18:23:12 kenanwangl@gmail.com: 📄 📄 📄 📄 📄 📄  
16:23:23 Ayries: Guess what!!  
16:26:43 kenanwangl@gmail.com: what?!  
16:30:41 Ayries: I'm gong to make a calendar and schedule 30 days of sex  
16:30:51 Ayries: Sex every day for thirty days  
16:31:07 Ayries: A meeting and a fuck a day!!  
16:31:15 kenanwangl@gmail.com: I should do that!  
16:31:22 kenanwangl@gmail.com: I'll be in ny for taboo  
16:31:42 Ayries: Yes!! We can be study buddies  
16:31:47 Ayries: 📄 📄  
16:32:00 kenanwangl@gmail.com: 📄 📄  
16:32:40 Ayries: Your doing taboo!!?  
16:33:01 kenanwangl@gmail.com: I'm in boh  
16:33:23 kenanwangl@gmail.com: I kinda wanna do too! but I'll be in boh  
16:35:50 Ayries: Well we can still be study buddies 📄 📄 📄 📄  
16:41:54 kenanwangl@gmail.com: yeah. we have a preexisting relationship 📄 📄

# **EXHIBIT "J"**

To: Ayries Blanck



Feb 15, 2018, 7:39 PM

Hey, sorry it's taken me so long. I'll have stuff for you tomorrow. Elis grandpa died and I've been talking to this lady about OT stuff. Btw had there been any new people who have left recently?

No worries. I got caught up on other stuff.

Ummmm hmmm I haven't heard of any new people leaving that I know

I'm sure people I don't know leave all the time though

Feb 15, 2018, 8:55 PM

lol I was thinking g more like ppl we nee about who left recently

Yeah I haven't heard of any recently

Do you know how serpil left onetaste?

Feb 16, 2018, 7:49 AM

I remember when Marc stopped working for OT. But serpil was still kind of involved. Antesa and I would say things about OT and serpil would get all triggered and say it didn't feel good. I don't know ultimately though. She and I don't talk. She's basically cut Antesa and I both out of her life, I think because she got jealous that we started a company together.

Feb 16, 2018, 6:22 PM

A journalist reached out to me from Bloomberg and is writing an article on onetaste company culture, I can't talk to her but she wants to talk to past staff and people who used to work for them. You can do it anonymous

I'm torn between not wanting to put any energy toward OT anymore and wanting to put them for being so fucked

Feb 16, 2018, 9:05 PM

That's how I feel. You can always s set a time limit and be like I have x amount of time then I'm not thinkingnor putting energy into it anymore

Feb 17, 2018, 8:31 AM

Also you mind deleting those last couple txt messages?

I'm deleting them on my end

Feb 17, 2018, 10:54 AM

ONETASTE 000386

EXH. J

Yeah I will

To: Ayries Blanck



Feb 16, 2018, 6:22 PM

A journalist reached out to me from Bloomberg and is writing an article on onetaste company culture, I can't talk to her but she wants to talk to past staff and people who used to work for them. You can do it anonymous

I'm torn between not wanting to put any energy toward OT anymore and wanting to put them for being so fucked

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That's how I feel. You can always set a time limit and be like I have x amount of time then I'm not thinking nor putting energy into it anymore

Feb 17, 2018, 8:31 AM

Also you mind deleting those last couple txt messages?

I'm deleting them on my end

Feb 17, 2018, 10:54 AM

Yeah I will

Oh wait ya you will delete or ya you want to talk to her?

I don't really want to talk to her

Ugh I don't know. I feel a sense of duty to but no desire to.

Ok well think on it, lol and thanks for deleting

Is the energy/time it involves that is the biggest reason your a no?

Feb 17, 2018, 12:24 PM

It's more that I really enjoy not having any attention on them.

Feb 17, 2018, 4:24 PM

That's how I feel. I always get pretty spun out when I start to think about it. I keep it in its little box and then when I go to therapy I take it out for a while and then put it back in again. It's the only way I can function really

I think she is mostly interested as your experience as an employee and the relationship a coach has with them. She wrote the article that was one of the first to call out and uncover ubers employment practices that eventually lead to the court cases and trials they had to go through.

EXH. J

Feb 18, 2018, 6:05 PM

ONETASTE 000387

Ok well I will talk to her if you want to pass her my info

# **EXHIBIT "K"**



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May 16, 2024

**VIA E-MAIL**

Julia Peng, Esq.  
REED SMITH LLP  
1221 McKinney Street, Suite 2100  
Houston, TX 77010

**Re: Onetaste Incorporated v. Ayries Blanck**  
**Our File No. 1056-1**

Dear Julia:

This letter is in response to your letter dated May 2, 2024, on behalf of Defendant Ayries Blanck (“Defendant”) and the purported issues raised therein. In that regard, Plaintiff OneTaste Incorporated (“Plaintiff”) responds as follows:

**I. Re OneTaste’s Preservation, Collection, and Review of Documents and Data**

In your letter, you mention that it is your understanding that OneTaste is performing its own collection and review of potentially responsive documents and electronically stored information (“ESI”), and then providing such documents to outside counsel (*i.e.*, our offices) for review and production, and you assert that this is “concerning” because OneTaste is unilaterally determining responsiveness. You further assert that “OneTaste’s productions have been unduly limited” and ask that we “disclose what criteria OneTaste has used to identify and produce responsive materials (e.g., custodians, search terms) and identify who from OneTaste has (1) directed the search for responsive materials and (2) participated in the search for responsive materials.”

First, what you characterize as “concerning” is, as you know, common place litigation practice. In fact, in my 23 years of litigation practice, I cannot recall a single case where production searches were not carried out by the client or in-house counsel for the client, who then turns the documents over to counsel for further review to ascertain relevance and privilege issues, prior to the subsequent production of the documents, which is the case here.

Second, your claim that OneTaste’s productions have been “unduly limited” has no basis in reality. To date, OneTaste has produced over 1500 pages of documents (in comparison to Blanck, who has only produced 621 documents, many of which were completely redacted pages), and, unlike Defendant, Plaintiff has committed to producing more documents. As far as your



request for Defendant to disclose what specific criteria was used to identify and produce responsive materials, you cite to no legal authority whatsoever that requires us to provide such information, as no such requirement exists. The questions you raise are questions that Defendant is welcome to ask during a deposition of OneTaste's person most knowledgeable, but certainly not information we are required to provide in connection with simply responding to Requests for Production. Notably, Defendant has provided no such details of what methods and criteria she has used to conduct her own searches for responsive documents and communications, for which she has provided next to nothing.

However, while Plaintiff is under no obligation to provide such information in response to Requests for Production, in the interests of meeting and conferring to resolve issues, Plaintiff will disclose that its in-house counsel (along with a small team of in-house paralegals), has directed the search for responsive materials and directly participated in the search for responsive materials, which has included conducting numerous key word searches through databases containing e-mails, text messages, and documents, in Plaintiff's possession, custody, and control.

In regards to your assertion that OneTaste has "produced virtually no e-mail communications," this is simply false. Plaintiff has produced 62 e-mails just in response to Defendant's Request for Production No. 1, alone. Furthermore, in regards to your assertion that Plaintiff's production has been "unduly limited," Plaintiff will have additional documents to produce in connection with Request No. 1, and hopes to provide such documents in the next 10-14 days, which we believe will complete Plaintiff's production in connection with Defendant's First Set of Requests.

However, as previously detailed in our objections, and explained by me again during our meet and confer call on April 10, 2024, the biggest cause of delay in completing Plaintiff's responses to Defendant's First Set of Requests has been due to Request No. 1 being extremely overly broad, and as drafted, improperly including all privileged communications between Plaintiff and its counsel for the last 9-years. As you know, this Request broadly seeks "All DOCUMENTS related to Ayries Blanck from August 20, 2015 to present," and includes no reference to any specific subject matter, or any exclusion for privileged communications with counsel. When I asked you and Nicole to provide a more limited scope/subject matter, during our call, I believe all you said was that the request was limited to documents relevant to Plaintiff's claims, which does not provide much guidance or limitations.

As I further explained during our call, the vast majority of the communications related to Defendant during that broad time period (following the settlement agreement), is between Plaintiff and counsel, and thus, privileged. Moreover, as I also explained, during this 9-year time period, there were hundreds, if not thousands of privileged communications between Plaintiff and counsel, and providing a privilege log for each and every such communication would be unduly burdensome and oppressive. Plaintiff will not engage in such an exercise, especially in light of Defendant's failure and refusal to narrow the scope of such request, and thus, for purposes of responding and completing its production, Plaintiff will presume that Defendant is not seeking privileged communications with counsel.

In regards to your assertion that "Plaintiff has produced communications in a format that resemble transcripts, and may be incomplete (*see, e.g.*, ONETASTE\_00809-829)," the communications you identify are text messages, which have been produced in the format of a "text file archive," which is one way that iPhones save backups of conversations. This is the

format that those particular communications are maintained by Plaintiff, and thus, the format that Plaintiff has produced them to Defendant. In the instances where Plaintiff is in possession of screen shots of relevant and responsive text messages, such screen shots have been produced (*see, e.g.*, ONETASTE 000279-280, 308, 312-313, 329, 351-352, 386-393, 826, 880, 972).

As far as your assertion that the communications are somehow “incomplete,” the text communications produced by Plaintiff in text file archive format (*i.e.*, transcripts), thus far, have generally been produced to provide a full and complete single day text exchange surrounding the relevant communications. This has been done to limit the production to *relevant* and responsive communications, which is all Plaintiff is required to produce, but to include enough of the surrounding communications to also include the full context of the conversation. If additional days of the text communications would have been relevant and responsive, Plaintiff would have produced the additional days. As you know, Plaintiff is not obligated to produce irrelevant and non-responsive text conversations that could go back or continue forward for many weeks or months (or longer), which would only serve to make Plaintiff’s production unnecessarily time consuming, burdensome, and voluminous. In fact, Defendant’s own production only included limited text message exchanges, and no doubt left out communications between Defendant and those same third-parties that Defendant or your office deemed to be irrelevant and non-responsive.

That being said, if there is a specific text exchange that Defendant asserts is somehow incomplete because it is missing an earlier or later relevant and responsive communication, necessary to provide proper context, please specifically identify all such communications by Bates numbers, and we will review your requests. To the extent that any such additional communications exist, are in Plaintiff’s possession, custody, or control, and are relevant, it will agree to produce them. Notably, all of the subject communications are between Defendant herself and various third-parties, and are thus, communications she could and should have produced if she truly believes that the copies produced by Plaintiff are somehow incomplete or missing necessary context.

In your letter you also request that Plaintiff “identify and describe what sources of electronically stored information have been preserved, collected, and reviewed thus far in connection with this case—including e-mail (e.g., Gmail, Outlook), messenger applications (e.g., instant message, Teams, Slack, WhatsApp), electronic devices (e.g. laptops, hard drives), social media accounts (e.g., LinkedIn, Facebook, Instagram), and databases (e.g., Salesforce, the “OM Hub”).” First, I will note that once again you cite no legal authority that requires or obligates Plaintiff to provide such detailed information in response to Requests for Production, and again seeks information that is more appropriate for a PMK deposition.

Second, and most notably, Defendant, who has produced only a handful of responsive documents, and nearly no e-mails or text messages (even between herself and her sister), has not provided any such details as to what sources of ESI she has preserved, collected, and reviewed in connection with her own responses to Requests for Production (*i.e.*, e-mail accounts, messenger accounts, devices, social media accounts, etc.). For Defendant, who unbelievably claims to have gotten rid of the majority of her relevant and responsive documents and communications, to demand such detailed information from Plaintiff, while failing and refusing to provide any such information herself, is completely ridiculous.

However, in the interests of good faith meeting and conferring, Plaintiff will disclose that as part of its efforts to gather and produce responsive documents, Plaintiff has conducted an extensive search of Gmail accounts of current and former employees, and Plaintiff's former social media accounts. Additionally, as part of Plaintiff's internal investigation following the release of the 2018 Bloomberg article, a number of current and/or former staff members allowed copies to be made of some of the data saved in their electronic devices. However, the voluntary copying of current and/or former staff members' devices was by no means comprehensive, as Plaintiff does not keep or have continued access to its current or former staff members' electronic devices, thus, limiting the available documents and communications to those that were previously shared with Plaintiff, all of which have been searched for relevant and responsive documents and produced. As far as data bases, Plaintiff has conducted searches of the online forums "OM Hub" and "MSE." In fact, Plaintiff has already produced one OM Hub and one MSE post, which were relevant and responsive to Defendant's requests, and will be producing more in its upcoming productions.

Your letter also mentions the "Salesforce" database, which is a customer management software that simply tracks calls to and from customers and potential customers, without providing any information as to why any information from that database would be relevant. There is absolutely no responsive information that would be contained in the Salesforce database that would be in any way relevant to Plaintiff's claims or Defendant's affirmative defenses thereto. If you disagree, please provide an explanation as to what specific relevant and responsive information Defendant believes is contained in the Salesforce database.

## **II. OneTaste's Production and ESI**

As mentioned in your letter, pursuant to Section 2031.280(d), Plaintiff is only required to produce ESI "*in the form or forms in which it is ordinarily maintained or in a form that is reasonably usable.*" While you incorrectly assert that Plaintiff has done neither, as explained below, it is clear that Plaintiff has done both, and has acted in full compliance with Section 2031.280(d).

The bulk of Plaintiff's files of this type are maintained as unreadable binary code. In order to comply with Defendant's production requests, Plaintiff has searched and exported these files as PDFs, which Plaintiff has produced in searchable format. However, contrary to Defendant's assertion, Plaintiff has also, when possible and available, produced a large number of files in their native format (with all meta data intact), including the following documents:

Native Email files produced:

- OneTaste 000180
- OneTaste 000181-182
- OneTaste 000183-184
- OneTaste 000186-187
- OneTaste 000189-190
- OneTaste 000191-192
- OneTaste 000194-195
- OneTaste 000196-197
- OneTaste 000199-200
- OneTaste 000202-203

OneTaste 000205-207  
OneTaste 000208-210  
OneTaste 000211-212  
OneTaste 000213-214  
OneTaste 000215-216

Native .csv files produced:

OneTaste 000179-180  
OneTaste 000831  
OneTaste 000833  
OneTaste 000860

Native Video Clips produced:

OneTaste 000805  
OneTaste 000906

Accordingly, where possible, Plaintiff has produced native format files as they are “ordinarily maintained,” or in cases where such production was not possible, Plaintiff has produced database documents in a PDF form that is fully searchable, and thus, “reasonably usable.” Conversely, it must be noted that Defendant has not produced any documents in their native format (with meta data intact), and has only produced PDF documents that are not even searchable, and thus, not “reasonably usable.” Thus, Plaintiff will continue to produce its ESI and other documents in conformity with Section 2031.280(d), by providing responsive documents in their native format (with meta data intact) where possible, or by producing the documents in a searchable (*i.e.*, reasonably usable) PDF format, when not possible.

In regards to your assertions that some documents have data corruption and processing issues, and/or were produced in partial form. I have reviewed the specific documents mentioned (*e.g.*, ONETASTE 000173, 176, 854), and did not find any data corruption or processing issues. I also did not find that they were in partial form. The first two documents are front pages of Goldman Sachs statements, while the third is a text exchange between Defendant and Maya Gilbert, which was provided to Plaintiff by Ms. Gilbert, and was produced because it was responsive to Defendant’s Requests. Plaintiff will be providing additional portions of Defendant and Ms. Gilbert’s text exchange in response to Defendant’s subsequent Requests that Plaintiff is in the process of responding to.

As far as your assertion that messages are missing attachments and embedded images/emojis, the attachments were produced by Plaintiff in all instances where Plaintiff had a copy to produce, and as far as any images/emojis missing, this is simply a product of the text file archive format which is how Apple produces historic texts and is beyond Plaintiff’s control, unless Defendant is suggesting that Plaintiff should manipulate the data to recreate emojis and/or images, which it is not required to do. Again, given that the majority of these communications are between Defendant and third-parties, she is free to produce these communications herself, if she claims they are incomplete, or she can subpoena them from the third-parties that she was communicating with. Plaintiff is only required to produce them in the format in which it is maintained and available to Plaintiff, which it has done in every instance.

### **III. OneTaste's Responses to Document Requests and Missing Privilege Log Entries**

As far as Plaintiff's objections to Defendant's Requests, Plaintiff does not intend to withdraw any of its objections, which it is entitled to make, even if just to preserve such objections. Moreover, as previously discussed, and as set forth in detail in Plaintiff's responses, there are numerous Requests that are so overly broad as to make it nearly impossible to produce documents and complete production for, without them being narrowed in scope as to subject matter and/or time frame (e.g., Requests Nos. 1, 28, 29, 42 - 65, 67 - 78, 106 - 110). Despite Plaintiff's responses providing specific examples of why these Requests are so overly broad and how unduly burdensome it would be to produce all documents responsive to these Requests (the majority of which are completely irrelevant to any of the claims in this case), and reiterating such issues again during our last meet and confer call, the only guidance you provided during our call to narrow the scope, was that Defendant is only seeking documents relevant to Plaintiff's claims. In that regard, despite Plaintiff's valid objections, Plaintiff has done its best to gather and produce responsive and relevant documents in response to all of these overly broad Requests.

As far as the completion of Plaintiff's responses to Defendant's First and Second Set of Requests for Production, Plaintiff believes it will be able to complete its production to the First Set of Requests in the next 10-14 days, which at this point is down to just completing its response to the overly broad Request No. 1. In regards to completing its production to Defendant's Second Set of Requests for Production, Plaintiff believes it will be able to complete such production in the next 21-30 days.

In regards to Plaintiff's privilege log, Plaintiff does intend to update its log to include additional documents, as well as the video interviews that were characterized in your letter as having been partially disclosed to the government in *United States v. Cherwitz*, 1:23-cr-00146 (E.D.N.Y). However, what your letter failed to mention is that on or about July 27, 2023, Judge Chen denied the U.S. government's motion to compel in connection with such interviews, and ruled that all of the referenced video taped witness interviews are protected by the work product privilege and that Plaintiff was not required to produce them in response to the U.S. government's subpoena, and that any portion of the video interviews that were previously shared with the U.S. government did not constitute a waiver of the work product privilege, pursuant to Federal Rule of Evidence 502. Accordingly, Plaintiff will not, and is not obligated to produce such video taped interviews in this case, as they are clearly protected attorney work product. However, Plaintiff will revise its privilege log to specifically include those items.

Moreover, as previously mentioned, in regards to Plaintiff's responses to Request No. 1, which broadly requests "All DOCUMENTS related to Ayries Blanck from August 20, 2015 to present," during this 9-year time period, there were hundreds, if not thousands of privileged communications between Plaintiff and counsel, and providing a privilege log for each and every such communication would be unduly burdensome and oppressive. Plaintiff will not engage in such an exercise. Notably, Defendant has yet to produce any privilege log whatsoever. Please confirm that Defendant is not withholding any responsive documents based on any privilege, and/or please provide a privilege log for any such documents.

Your letter also mentions documents produced by Plaintiff that contain redactions, and ask that all such redactions either be removed, or that Plaintiff provide a log setting forth the basis for each redaction. Plaintiff's redactions consist of removing private account numbers from

financial statements that were produced, and redactions of some customer names and possibly contact information of unrelated third-parties, to protect their rights of privacy. For instance, in the documents referenced in your letter (e.g., ONETASTE 000468-543, 544-619, 620-695, 696-792), the redactions simply removed the names (and in some cases the e-mail addresses) of customers who purchased or expressed interest in purchasing the product(s) referenced therein. These names have no relevance whatsoever to Plaintiff's claims or Defendant's defense thereto. In fact, the only reason those particular documents were produced at all was out of an abundance of caution given the overly broad nature of Defendant's Requests. However, all of Plaintiff's redactions were made very judiciously to be as limited as possible.

Conversely, Defendant has redacted and partially redacted whole portions and pages of numerous documents/communications, without any explanation whatsoever (including BLANCK 0000049 (partial), 50, 492 (partial), 493-496, 537 (partial), 540 (partial), 541-545, 548 (partial), 549 (partial), 550-553, 558 (partial), 562 (partial), 563-567, 568 (partial), 569 (partial), 570-608, and 610-620). Notably, Defendant has failed to provide any log setting forth the basis for these redactions, as she now demands of Plaintiff. To the extent that Defendant's redacted documents consist of communications, Plaintiff is entitled to know who the redacted communications were between and when such communications took place, and on what basis such communications and/or documents were redacted.

#### **IV. OneTaste's Interrogatory Responses**

In your letter Defendant requests that Plaintiff amend its response to Form Interrogatory No. 12.4, in connection with the video taped interviews, already discussed in the prior section. However, all of the requested information as to the persons/witnesses videotaped, the date(s) such videotaped interviews took place, and the names and contact information of the individual(s) who conducted the interviews, are already provided in response to Form Interrogatory No. 12.3. As previously mentioned, all such videotaped interview constitutes attorney work product, and will not be produced, but will be included in Plaintiff's revised privilege log.

#### **V. OneTaste's Requests for Admission**

Defendant's position that she cannot respond to Plaintiff's entire Second Set of Requests for Admission and admit the "genuineness" of the attached communications, because of the format in which some of the text communications were produced, is completely ridiculous, evasive, and in bad faith.

As previously discussed, the format of some of the text communications attached to the Second Set of RFAs, that you assert are "unreliable," is "text file archive" format, which is how Apple produces historic text messages. There is nothing inherently "unreliable" about this format, and short of producing them in binary code, there is no more reliable format. Moreover, given that all of the attachments to the RFAs consist of communications between Defendant and one or more third-parties, even if Defendant does not want to admit the genuineness of the document, she can certainly review the documents and admit or deny the statements *made by her* therein, and respond to the Requests asking her to admit such statements. If she cannot make an unqualified admission to any of these Requests, for whatever reason, she can explain and provide all the facts related thereto in her responses to the related Form Interrogatory No. 17.1.

Furthermore, there are numerous attachments/exhibits to Plaintiff's Second Set of RFAs that are not in text file archive format, including Exhibits 1 - 9, 12, 15, 23 - 26, 32, 34, 35 (produced by Blanck), 39 - 42, 43 (produced by Blanck), 44 (produced by Blanck), 45, and 46). There is absolutely no reason why Defendant cannot admit or deny the genuineness of all such exhibits/attachments, and also respond to the remaining Requests that do not ask Defendant to admit the genuineness of any documents.

Plaintiff will agree to Defendant's request for a 30-day extension to respond to Plaintiff's Second Set of RFAs and Third Set of Form Rogs, but Plaintiff will not agree to reproduce any of the exhibits or withdraw any of the Requests. Plaintiff had previously offered to withdraw some of the Requests consisting of quoted language from the exhibits themselves, for any exhibits which Defendant agreed in advance to admit its genuineness. However, from reviewing your letter it appears that Defendant does not intend to admit the genuineness of any of the exhibits, thus, making it necessary to ask her to admit all of her own statements made therein.

**VI. Defendant's Failure To Provide Code Compliant Responses to Plaintiff's Requests for Production**

During our meet and confer call on April 10, I identified several categories of documents for which Defendant previously stated she would produce responsive documents, but for which none were ever produced, including, but not limited to: (1) communications between Defendant and Ellen Huet or Bloomberg (Requests Nos. 12 and 24); (2) communications between Defendant and her sister, Autymn Blanck, including the transmission and production of Defendant's own journals that were indisputably provided to Autymn, and subsequently read by her during the Netflix Documentary (Request No. 16); and (3) communications between Defendant and Ravi Agrawal (Request No. 29).

It is our understanding that Defendant is taking the position that none of those documents (and others) currently exist and/or are no longer in her possession, custody, or control. To the extent that is the case, I advised during our call that the aforementioned responses would need to be amended to reflect that Defendant does not actually intend to produce documents in response to those Requests. I also explained that we do not believe that those responses and other similar responses are Code compliant under CCP Section 2031.230, which requires Defendant to "*set forth the name and address of any natural person or organization known or believed by [her] to have possession, custody, or control of that item or category of item.*" Thus, Defendant is required to provide us with the name and address of any such person or organization, including, but not limited to her mobile phone provider and/or e-mail provider during the relevant time period, so that, if necessary, we can subpoena those third-parties directly for the missing documents.

During our call, Nicole stated that you would need 30 days to research the issue and to provide us with amended (presumably Code compliant) responses. It has now been well over 30-days since our meet and confer, and we still have not received any such amended responses. Those amended responses must be provided immediately.

Furthermore, in an e-mail dated April 8, 2024, Nicole stated, as an explanation as to why Defendant purportedly has so few responsive documents, that "A few years ago, Ms. Blanck grew very concerned from OneTaste's constant outreach, and took measures to cut herself off from all ties to OneTaste. She no longer has access to the phone, Gmail, or other accounts that

Julia Peng, Esq.  
May 16, 2024  
Page 9

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connected her to OneTaste.” Nicole also indicated in a subsequent e-mail that these steps were purportedly taken by Defendant *prior* to the filing of this lawsuit. However, this rings false, as two of the documents in Defendant’s production (BLANCK\_0000459 and 460) show that Defendant had access to her Gmail account as recently as November 10, 2022, which was *after* the Complaint in this case was filed on October 7, 2022. Further, her document produced, Bates stamped as Blanck 0000621-622, evidences that she has at least some access to communications dating back to August 2014. Thus, in addition to the information regarding the specific accounts purportedly deleted, we also request that Defendant provide the specific month and year (and date, if possible) when she purportedly deleted these accounts and/or communications.

Very truly yours,



PIERRE B. PINE

PBP/pbp

cc: Edwin F. McPherson, Esq.

C:\Dropbox\WP9-DOCS\BUS\ONETASTE (v. Blanck)-09 RESPONSE TO MEET AND CONFER LETTER FROM JULIA PENG RE DOCUMENT PRODUCTIONS.wpd



**DEFENDANT AYRIES BLANCK  
EXHIBITS D1 TO D9**

# **EXHIBIT D1**

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* APRIL 3, 2023 \*  
BROOKLYN OFFICE

LHE:GK/DL/JS  
F.#2018R01401

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

Judge Diane Gujarati  
Magistrate Judge Robert M. Levy

UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. 23-CR-146  
(T. 18, U.S.C., §§ 1594(b) and 1594(d),  
2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

RACHEL CHERWITZ and  
NICOLE DAEDONE,

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants and Relevant Entities

1. OneTaste, Inc. was a privately-held California corporation with a principal place of business in San Francisco, California. OneTaste, Inc. and several affiliated companies, including but not limited to OneTaste NYC LLC, OneTaste NY Acquisition LLC, Mirror Clan Inc., One Taste Investments LLC, One Taste Holdings LLC, OneTaste Media LLC, Caravan Retreats Inc., OTBA Inc., Texas Limbic Network LLC, and The Next Right Thing LLC (collectively, "OneTaste") operated at variously points in locations within the Eastern District of New York and elsewhere, including but not limited to Brooklyn, New York; Manhattan, New York; San Francisco, California; Los Angeles, California; Denver, Colorado; Boulder, Colorado; Austin, Texas; and London, United Kingdom.

2. OneTaste promoted itself as a sexuality-focused wellness education company, which offered hands-on classes on “orgasmic meditation” (“OM”), a partnered practice typically involving the methodical stroking of a woman’s genitals for a period of fifteen minutes. OneTaste generated revenue by providing courses, coaching and events related to OM and other “wellness practices,” in exchange for a fee.

3. Individuals who associated themselves with OneTaste, either as employees, or as frequent participants in OneTaste courses and events, identified themselves as “members” of OneTaste.

4. The defendant NICOLE DAEDONE was a resident of San Francisco, California and New York, New York. DAEDONE was a co-founder of OneTaste and OneTaste’s Chief Executive Officer from approximately 2004 to 2017.

5. The defendant RACHEL CHERWITZ was a resident of San Francisco, California and New York, New York. CHERWITZ was OneTaste’s Head of Sales from approximately 2009 to 2018.

## II. The Forced Labor Scheme

6. In or about and between 2006 and May 2018, the defendants, NICOLE DAEDONE and RACHEL CHERWITZ, together with others, obtained the labor and services of a group of OneTaste members by subjecting them to economic, sexual, emotional and psychological abuse; surveillance; indoctrination; and intimidation.

7. In furtherance of the scheme, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with their co-conspirators, deployed a number of abusive and manipulative tactics in order to obtain the labor and services of these members. For example, DAEDONE, CHERWITZ and their co-conspirators:

(a) intentionally recruited individuals who had suffered prior trauma to participate in OneTaste, and advertised that OneTaste's courses and teachings could heal past sexual trauma and dysfunction;

(b) induced the OneTaste members, including OneTaste employees, to incur debt, and at times facilitated the OneTaste members in opening lines of credit, to finance expensive OneTaste courses that the defendants knew the OneTaste members could not afford;

(c) subjected the OneTaste members to constant surveillance in communal homes that OneTaste oversaw. DAEDONE, CHERWITZ and their co-conspirators further directed that the OneTaste members sleep in shared assigned beds and eat, work and travel in groups, as a means of rendering the OneTaste members dependent on OneTaste for their shelter and basic necessities and limiting the OneTaste members' independence and control;

(d) demanded absolute commitment to DAEDONE, including by exalting DAEDONE's teachings and ideology, and not tolerating dissent;

(e) collected sensitive information about the OneTaste members, including but not limited to information pertaining to the OneTaste members' prior trauma, sexual histories and relationships, as a means of influencing and controlling the OneTaste members; and

(f) isolated the OneTaste members by encouraging them to limit contact with people outside of the OneTaste community, and by breaking up established romantic relationships among the OneTaste members, as a means of rendering the OneTaste members emotionally, socially and psychologically dependent on OneTaste.

8. Upon securing the allegiance of the OneTaste members through, among others, the above tactics, the defendants NICOLE DAEDONE and RACHEL CHERWITZ,

together with their co-conspirators, then engaged in abusive employment practices. For example, DAEDONE, CHERWITZ and their co-conspirators promised to pay the OneTaste members wages and commissions for work performed on behalf of OneTaste and subsequently declined to pay the OneTaste members the amounts owed, or changed the OneTaste members' employment statuses or locations without advance notice, as a means of rendering the OneTaste members dependent on OneTaste for their livelihoods and financial wellbeing.

9. As part of their employment at OneTaste, some of the OneTaste members engaged in sexual activity at the direction of the defendants NICOLE DAEDONE and RACHEL CHERWITZ. For example, DAEDONE and CHERWITZ, together with their co-conspirators, recruited and groomed OneTaste members to engage in sexual acts with OneTaste's current and prospective investors, clients, employees and beneficiaries, for the financial benefit of OneTaste and, in turn, the defendants. DAEDONE and CHERWITZ also instructed the OneTaste members to engage in sexual acts they found uncomfortable or repulsive as a requirement to obtain "freedom" and "enlightenment" and demonstrate their commitment to OneTaste and DAEDONE.

10. Resistance to the directives of the defendants was not tolerated. The defendants NICOLE DAEDONE and RACHEL CHERWITZ subjected the OneTaste members to public shame, humiliation and workplace retaliation if they failed to adhere to the defendants' directives. Moreover, the defendants and their co-conspirators employed harassment and coercion to intimidate and attack OneTaste members perceived to be enemies and critics of DAEDONE and/or OneTaste.

FORCED LABOR CONSPIRACY

11. The allegations contained in paragraphs one through ten are realleged and incorporated as if fully set forth in this paragraph.

12. In or about and between 2006 and May 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with others, did knowingly and intentionally conspire to:

(a) provide and obtain the labor and services of one or more persons by means of, and by a combination of means of: (i) force, threats of force, physical restraint and threats of physical restraint to a person; (ii) serious harm and threats of serious harm to a person; (iii) the abuse and threatened abuse of law and legal process; and (iv) one or more schemes, plans, and patterns intended to cause a person to believe that, if he or she did not perform such labor and services, a person would suffer serious harm and physical restraint, contrary to Title 18, United States Code, Section 1589(a); and

(b) benefit, financially and by receiving anything of value, from participation in a venture which has engaged in the providing or obtaining of labor or services by any such means, knowing, and in reckless disregard of the fact, that said venture had engaged in the providing and obtaining of labor and services by any such means, contrary to Title 18, United States Code, Section 1589(b).

(Title 18, United States Code, Section 1594(b); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

13. The United States hereby gives notice to the defendants, that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d) of (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or any property traceable to such property.

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;



it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL

  
FOREPERSON

By Carolyn Pokorsy, Assistant U.S. Attorney  
BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F.#: 2018R01401  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

*RACHEL CHERWITZ and NICOLE DAEDONE,*

Defendants.

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**INDICTMENT**

(T. 18, U.S.C., §§ 1594(b), 1594(d), 2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p))

---

*A true bill.*

*Deighton Reid*  
Foreperson

---

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

-----  
Clerk

*Lauren H. Elbert, Gillian Kassner, Devon Lash, Jonathan Siegel*  
*Assistant U.S. Attorneys (718) 254-7000*

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* APRIL 3, 2023 \*  
BROOKLYN OFFICE

**INFORMATION SHEET**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

23-CR-146  
Judge Diane Gujarati  
Magistrate Judge Robert M. Levy

1. Title of Case: United States v. Rachel Cherwitz and Nicole Daedone
2. Related Magistrate Docket Number(s): 23-MC-715
3. Arrest Date: N/A
4. Nature of offense(s):  Felony  
 Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): \_\_\_\_\_
6. Projected Length of Trial: Less than 6 weeks   
More than 6 weeks
7. County in which crime was allegedly committed: Queens  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.<sup>1</sup>  Yes  No
9. Has this indictment/information been ordered sealed?  Yes  No
10. Have arrest warrants been ordered?  Yes  No
11. Is there a capital count included in the indictment?  Yes  No

BREON PEACE  
United States Attorney

By: /s/ \_\_\_\_\_  
Lauren H. Elbert  
Gillian Kassner  
Jonathan Siegel  
Assistant U.S. Attorneys  
(718) 254-7000

<sup>1</sup> Judge Brodie will not accept cases that were initiated before March 10, 2012.

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* APRIL 3, 2023 \*  
BROOKLYN OFFICE

\*\*\*\*\*

Indictment

23-CR-146  
Docket Number  
Judge Diane Gujarati  
Magistrate Judge Robert M. Levy

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_ Defendant \_\_\_ DOJ   
Name: Gillian Kassner  
Firm Name: U.S. Attorney's Office, EDNY  
Address: 271A Cadman Plaza East, Brooklyn, NY 11201

Phone Number: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_ NO   
If yes, state description of document to be entered on docket sheet:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_


A) If pursuant to a prior Court Order:  
Docket Number of Case in Which Entered: \_\_\_\_\_  
Judge/Magistrate Judge: \_\_\_\_\_  
Date Entered: \_\_\_\_\_

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

risk of flight or destruction of evidence

ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.

DATED: Brooklyn <sup>4/3/23</sup>, NEW YORK

  
\_\_\_\_\_  
U.S. DISTRICT JUDGE

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_  
DATE

MANDATORY CERTIFICATION OF SERVICE:

A.) \_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.)  This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

4/3/23  
\_\_\_\_\_  
DATE

  
\_\_\_\_\_  
SIGNATURE

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* APRIL 3, 2023 \*  
BROOKLYN OFFICE

INDICTMENT SEALING FORM

Case name: United States v. Rachel Cherwitz and Nicole Daedone

23-CR-146

Judge Diane Gujarati

Magistrate Judge Robert M. Levy

Reason for Sealing:

The defendants are currently at liberty, and the government plans to effectuate the arrests in the coming weeks. The government seeks to seal the indictment to ensure that the defendants do not learn that they are under indictment and to prevent them from fleeing justice to avoid arrest and prosecution. Notably, the indictment has been returned within the applicable statute of limitations and sealing is not requested simply to toll the statute.

By:

/s/   
\_\_\_\_\_

Gillian Kassner  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Date: April 3, 2023

# **EXHIBIT D2**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

23-CR-146 (DG)

- against -

RACHEL CHERWITZ and  
NICOLE DAEDONE,

Defendants.

----- X

GOVERNMENT'S MEMORANDUM IN OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS OR FOR A BILL OF PARTICULARS

BREON PEACE  
United States Attorney  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

LAUREN H. ELBERT  
JONATHAN SIEGEL  
DEVON LASH  
Assistant U.S. Attorneys  
(Of Counsel)

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PRELIMINARY STATEMENT

The government respectfully submits this memorandum in response to the motion of defendants Rachel Cherwitz and Nicole Daedone to dismiss the Indictment, or, in the alternative, for a bill of particulars, ECF Dkt. No. 69 (the “motion” or “Mot.”). For the reasons set forth below, the government respectfully submits the motion should be denied in its entirety.

RELEVANT FACTUAL BACKGROUND

I. The Indictment

On April 3, 2023, a grand jury sitting in the Eastern District of New York returned the Indictment, ECF Dkt. No. 1, charging defendants Cherwitz and Daedone with conspiring to “obtain the labor and services of a group of OneTaste members by subjecting them to economic, sexual, emotional and psychological abuse; surveillance; indoctrination and intimidation.” Indictment ¶ 6. The Indictment includes an itemized list of tactics employed by the defendants and their co-conspirators to obtain the labor and services, including, for example, “induc[ing] OneTaste members, including OneTaste employees, to incur debt,” id. ¶ 7(b); “subject[ing] OneTaste members to constant surveillance in communal homes,” id. ¶ 7(c); “collect[ing] sensitive information about the OneTaste members . . . as a means of influencing and controlling [them,]” id. ¶ 7(e); and “isolat[ing] the OneTaste members by encouraging them to limit contact with people outside of the OneTaste community,” id. ¶ 7(f). The Indictment further alleges that the defendants engaged in abusive employment practices, such as (1) refusing to pay OneTaste members wages and commissions, id. ¶ 8 and (2) directing OneTaste members to engage in sexual acts with current and prospective investors, clients, employees and beneficiaries. Id. ¶¶ 8-9. The Indictment additionally alleges specific tactics employed by the defendants to perpetuate the scheme by

penalizing dissenters, such as subjecting OneTaste members or perceived critics of OneTaste to harassment, public shame and workplace retaliation.

Cherwitz was arraigned in the Eastern District of New York on June 20, 2023; Daedone on June 13, 2023. Prior to their arraignments, the government filed detention memoranda which supplied additional detail on the charged offenses and the individual defendants. ECF Dkt. Nos. 4 (Cherwitz), 9 (Daedone).

## II. Discovery

To date, the government has made fourteen productions of discovery to the defense pursuant to Rule 16 of the Federal Rules of Criminal Procedure, totaling approximately 2.7 terabytes of data. Each production has been accompanied by a detailed cover letter that functions as an index to the discovery material. These productions have included, among other things:

- Text, email correspondence and Slack messages among members of OneTaste, including the defendants, discussing, among other things, OneTaste courses and activities, experiences at OneTaste and allegations of sexual misconduct or abuse;
- Contemporaneous journal entries from three different individuals regarding experiences at OneTaste;
- Videos, photographs and audio recordings concerning OneTaste created by OneTaste members;
- Published articles, transcripts of speeches and discussions, promotional videos, and advertisements for OneTaste;
- Financial records concerning accounts used by the defendants, OneTaste, and its affiliates from more than a dozen institutions;
- Social media records;

- Information about the OneTaste residences, including resident rosters, documents about communal living spaces, and leases;
- Salesforce documentation, customer lists, records, and training materials used by OneTaste’s sales team;
- Employment records, timesheet and wages report for former OneTaste employees and contractors;
- Documents and records containing written agreements with OneTaste employees, contractors, and volunteers regarding responsibilities and compensation;
- Documents concerning OneTaste’s organizational hierarchy; and
- Various materials concerning OneTaste provided by 23 individuals, whose identities the government has provided to defense counsel.

In addition, the government has disclosed to the defense, by letter, summaries of portions of witness statements given by over 20 witnesses and identified each of the witnesses.

## ARGUMENT

### I. The Indictment Should Not Be Dismissed

For the reasons set forth below, the government respectfully submits that the Indictment sufficiently states the charged offense and there is no lawful basis for its dismissal.

#### A. Applicable Law

Motions to dismiss indictments must satisfy a high standard and are disfavored. See United States v. Bustos de la Pava, 268 F.3d 157, 165 (2d Cir. 2001) (“[D]ismissal of an indictment is an extraordinary remedy reserved for extremely limited circumstances implicating fundamental rights.”) (citation and internal quotation marks omitted); see also United States v. Kerik, 615 F. Supp. 2d 256, 262 (S.D.N.Y. 2009) (“A defendant seeking to dismiss counts under

Rule 12 must satisfy a high standard”) (citation and internal quotation marks omitted); United States v. Brooks, No. 06-CR-550 (JS), 2009 WL 3644122, at \*2-\*3 (E.D.N.Y. Oct. 27, 2009) (same).

It is well-established that “an indictment is sufficient if it, first, contains the elements of the offense charged and fairly informs a defendant of the charge against which he must defend, and, second, enables him to plead an acquittal or conviction in bar of future prosecutions for the same offense.” United States v. Alfonso, 143 F.3d 772, 776 (2d Cir. 1998) (quoting Hamling v. United States, 418 U.S. 87, 117 (1974)). The Federal Rules of Criminal Procedure require only that an indictment contain a “plain, concise and definite written statement of the essential facts constituting the offense charged.” F. R. Crim. P. 7(c).

The Second Circuit has held that an indictment that tracks the language of the statute is sufficient to meet these notice requirements. See United States v. Flaharty, 295 F.3d 182, 198 (2d Cir. 2002) (“[A]n indictment need only track the language of the statute and, if necessary to apprise the defendant of the nature of the accusations against him . . . state time and place in approximate terms.”); United States v. Citron, 783 F.2d 307, 314 (2d Cir. 1986) (“Where . . . an indictment tracks the statutory language and specifies the nature of the criminal activity . . . it is sufficiently specific to withstand a motion to dismiss.”); United States v. Stavroulakis, 952 F.2d 686, 693 (2d Cir. 1992) (“[A]n indictment need do little more than to track the language of the statute charged and state the time and place (in approximate terms) of the alleged crime.”); United States v. Bernstein, 533 F.2d 775, 786 (2d Cir. 1976) (observing that the Second Circuit has “consistently sustained indictments which tracked the language of the statute and, in addition, do little more than state time and place in approximate terms.”).

“The Supreme Court has held that . . . a [conspiracy] count need only ‘identify the offense which the defendants conspired to commit . . .’, and that it need not ‘with technical precision, state all the elements essential to the commission of the [substantive] crimes . . .’ ” United States v. Messina, 481 F.2d 878, 880 (2d Cir. 1973) (quoting Williamson v. United States, 207 U.S. 425, 447 (1908)); United States v. Wydermyer, 51 F.3d 319, 325 (2d Cir. 1995) (same); see also United States v. Mitchell, 372 F. Supp. 1239, 1253 (S.D.N.Y.) (“An indictment charging the essential elements of a conspiracy need not allege with particularity the means by which the substantive crime alleged to be the object of the conspiracy was to be accomplished.”) (citations omitted), appeal dismissed, 485 F.2d 1290 (2d Cir. 1973).

On a pre-trial motion to dismiss, the court must accept all factual allegations in the indictment as true and “the sufficiency of the evidence is not appropriately addressed on a pre-trial motion to dismiss an indictment.” Alfonso, 143 F.3d at 776-77; see also United States v. Yakou, 428 F.3d 241, 246 (D.C. Cir. 2005) (“There is no federal criminal procedural mechanism that resembles a motion for summary judgment in the civil context”).

#### B. Discussion

The Indictment put the defendants on sufficient notice of the charge against them, complying with the requirements of the Sixth Amendment, and there is no basis for dismissal.

Under governing Second Circuit precedent, to be sufficient, an indictment charging conspiracy need only identify the offense which the defendants are charged with conspiring to commit. Wydermyer, 51 F.3d at 325. The Indictment here clearly meets that low standard, identifying the object of the conspiracy to be the offense of forced labor, as prohibited by 18 U.S.C. § 1589(a) and (b). Indictment ¶ 12. The defendants’ motion thus failed to meet the high bar required to establish their entitlement to dismissal.

While the Court need go no further to uphold the Indictment, the government respectfully submits the Indictment provides more detail than is lawfully required and that defendants' complaints are baseless. In the motion to dismiss, Cherwitz and Rachel complain that the indictment "is silent as to nearly all factual details." Mot. at 15. This is not true. The speaking indictment identifies: the corporate vehicle through which Daedone and Cherwitz perpetrated the charged conspiracy, i.e., OneTaste and its affiliates, Indictment ¶¶ 1, 6, 7; the locations where OneTaste and its affiliates operated, *id.* ¶ 1, the ways in which OneTaste generated revenue, *id.* ¶ 2, specific criminal conduct employed by the defendants to obtain the labor of the OneTaste members who were victims of the scheme, *id.* ¶¶ 6-7, 10; abusive labor practices in which the defendants engaged, *id.* ¶ 8, and specific forms of labor that OneTaste members were directed to perform, including sexual conduct, *id.* ¶ 9, and the time frame in which the defendants engaged in the charged conduct, *id.* ¶ 12. The Indictment thus provides more than the bare minimum required by law; it provides the defense with a roadmap of how the government intends to prove the charged offense.

The cases cited by the defendants do not support their argument that the Indictment is deficient under the Sixth Amendment. First, in Urso, the district court was considering an indictment that included both substantive counts of extortion and a conspiracy count. 369 F. Supp. 2d 254, 265-66 (E.D.N.Y. 2005). Judge Garaufis dismissed two substantive counts of extortion for lack of specificity, but denied the motion to dismiss the extortion conspiracy count, which used "language very similar to that employed" by the two substantive counts. *Id.* at 267-68. Judge Garaufis denied the motion as to the conspiracy count because "it is well established that an indictment for conspiracy to commit a criminal offense may be stated with less specificity than an indictment charging the commission of that substantive offense." *Id.* (citing United States v.

LaSpina, 299 F.3d 165, 177 (2d Cir. 2002); United States v. Daily, 921 F.2d 994, 999 (10th Cir. 1990); United States v. Ramos, 666 F.2d 469 (11th Cir. 1982); United States v. Annoreno, 460 F.2d 1303, 1311 (7th Cir. 1972); Brown v. United States, 403 F.2d 489, 490 (5th Cir. 1968)). As Judge Garaufis observed, “[a]n indictment charging conspiracy ‘need only put the defendants on notice that they are being charged with a conspiracy to commit the underlying offense. Thus, to prevail on their claim that the conspiracy count is insufficient, the defendants must show that the indictment is not sufficient to identify the offense which the defendant conspired to commit.’” Id. (citing Wydermyer, 51 F.3d at 325 (internal quotation marks omitted)). Here, the Indictment clearly identifies the crime which Cherwitz and Daedone conspired to commit. As with the conspiracy count in Urso, the conspiracy here is adequately pled.

Even comparing the substantive counts dismissed by Judge Garaufis in Urso to the conspiracy count charged in this case shows that the Indictment here is adequately pled. As Judge Garaufis noted, the counts of the indictment that were the subject of the motion in Urso “failed to name the alleged victim or victims, the individuals alleged to have worked with [the defendant], the location or locations where extortionate acts are alleged to have occurred . . . , the dates and times of the alleged offenses, the amounts of the loans, or the nature of the threats allegedly employed.” Id. at 265. By contrast, the indictment in this case provides far more particulars, as set forth above, including by identifying the class of individuals alleged to have been victimized by the charged offense, the approximate dates of the alleged offenses and detailing the tactics used by the conspirators to seek to obtain the labor and services of those individuals.

The defense points to another extortion case, Tomasetta, from the First Circuit in 1970, as support for their argument that the indictment here is insufficient. Tomasetta provides them no such support, as it explains that “what is a fair description of a crime for purposes of

permitting an adequate defense necessarily varies with the nature of the offense and the peculiarities of defending against the kind of charge involved.” 429 F.2d at 979. Examination of the case in Tomasetta and that charged here shows why the Tomasetta court’s reasoning has no application. The Court in Tomasetta, which charged the defendant with extortionate collection of credit, in violation of 18 U.S.C. § 894, noted that the defendant in this case lacked sufficient information to present an alibi defense. Id. at 979-980. Given the nature of the allegations in this case, which charge a sweeping multi-year conspiracy carried out by the executives of an international corporation, no alibi defense would be possible. The Tomasetta court further pointed to the nature of the crime (extortionate collection of credit) as a “speaking offense,” where the “substance of the conversation in issue” would obviously be critical. Id. at 980. The Indictment here does not charge a similar offense.

The defense further cites a decision by Judge Garaufis in United States v. Raniere, 384 F. Supp. 3d 282, 312 (E.D.N.Y. 2019), in which Judge Garaufis stated that the defendant “might have had a good argument” that the indictment insufficiently pled forced labor, but that Raniere had received additional information on top of the indictment, such as a detention memo and Rule 16 discovery, that provided him abundant additional notice. Notably, the indictment in Raniere was not a speaking indictment, and only contained statutory charging language. 18-CR-204 (NGG), ECF Dkt. No. 14. Here, the Indictment includes much more detail; moreover, as in Raniere, the defendants’ crimes were discussed in the detention memoranda and they have received abundant Rule 16 discovery. Judge Garaufis’s reasoning in his comment in Raniere supports the Indictment in this case.

The defendants also argue that the Indictment violates their Fifth Amendment rights, because “[t]here is no way to ensure . . . that the evidence presented at trial is the evidence



that was presented to the grand jury.” Mot. at 17. In support of this argument, the defendants contend that because the Indictment does not specifically identify any victims of the charged offense, it is deficient. Here again, the defendants overlook that the instant case charges a conspiracy and not a substantive offense. The defendants could be proven guilty if they never forced any victim to do anything—so long as the evidence proves beyond a reasonable doubt that they agreed to do so. Consequently, the cases cited by the defense, which relate to charges where the identity of the specific victim was a significant element of the offense, are inapposite. For example, United States v. Agone, 302 F. Supp. 1258, 1261 (S.D.N.Y. 1969), dealt with a charge for which the “identity and character of the victim are at ‘the very core of criminality,’” namely a charge proscribing specifically assaults against union members designed to restrain, coerce or intimidate the member. The forced labor charge is not similarly only applicable against a certain statutorily-defined class of individuals—i.e. union members—such that the specific identity of the victim is of the same significance. This is especially true in a conspiracy case, where the proof need not establish that anyone was, in fact, victimized. Likewise, United States v. Solovey, No. 04-CR-244S, 2005 WL 1279228, at \*2-\*3 (W.D.N.Y. May 31, 2005), involved a substantive offense, which “require[d] the existence of a victim in order for a crime to have been committed.” That is not the case here.

The defendant’s quotation of United States v. Gordon, 641 F.2d 1281, 1286 (9th Cir. 1981), relies upon a misleading alteration. Defendants argue that Gordon stands for the proposition that an Indictment can violate the Fifth Amendment where it does not avoid a circumstance in which “the grand jury was thinking of one [victim] and the petit jury of another.” Mot. at 18. Gordon says nothing of the kind—Gordon does not address identification of victims at all, it is a case involving a Travel Act bribery charge. The district court denied a motion under

Rule 29 raising a variance argument because the government’s indictment charged a conspiracy that did not specifically cite a provision of Nevada State Code defining what type of public officer must be the recipient of a bribe in order to make out the elements of the state offense. The Court wrote of the possibility that “the grand jury was thinking of one public officer, and the petit jury of another,” *id* at 1286, but concluded that there had been no variance because both the grand jury and petit jury “were operating under the same set of facts.” *Id.* at 1287. Likewise, the trial jury here will be assessing “the same set of facts,” i.e. the conspiracy charged in the Indictment.

In sum, there is no basis to dismiss the Indictment in this case. The Indictment clearly states the object of the conspiracy, Wydermyer, 51 F.3d at 325, and provides enough detail to reasonably apprise the defendants of the nature of the charges against them. Russell v. United States, 369 U.S. 749, 766 (1962). That is all that is constitutionally required.

## II. The Defendants’ Motion for a Bill of Particulars Should Be Denied

The defendants move for a bill of particulars pursuant to Fed. R. Crim. P. 7(f) arguing that further disclosure is required in order to prepare for trial, but, notably, do not identify any specific particulars that they are asking the Court to require. This total lack of specificity reveals that their true intent is to improperly use a bill of particulars as a “discovery device” and a “general investigative tool.” United States v. Perryman, 881 F. Supp. 2d 427, 430-31 (E.D.N.Y. 2012). This is inappropriate given the specificity of the Indictment and the comprehensive discovery provided to date, and moreover such relief is expressly prohibited by established precedent. For the reasons stated below, the defendants’ motion should be denied in its entirety.

### A. Applicable Law

The Federal Rules of Criminal Procedure require only that an indictment set forth a “plain, concise, and definite written statement of the essential facts constituting the offense.”

Fed. R. Crim. P. 7(c). Neither the Federal Rules of Criminal Procedure nor the Second Circuit requires that the government “particularize” its evidence; rather, a bill of particulars is required only when the charges in the indictment are so general that they fail to apprise the defendant of the specific acts of which he or she is accused. See United States v. Torres, 901 F.2d 205, 234 (2d Cir. 1990). If the information sought by the defendant is provided in the indictment or through some other means, including discovery, a bill of particulars is not warranted. See United States v. Chen, 378 F.3d 151, 163 (2d Cir. 2004); United States v. Walsh, 194 F.3d 37, 47 (2d Cir. 1999); Torres, 901 F.2d at 234; United States v. Bortnovsky, 820 F.2d 572, 574 (2d Cir. 1987); United States v. Urso, 369 F. Supp. 2d 254, 271 (E.D.N.Y. 2005). The defendant bears the burden of showing that denial of the requested particulars will result in “prejudicial surprise at trial or will adversely affect his rights.” United States v. Maneti, 781 F. Supp. 169, 186 (W.D.N.Y. 1991).

It is inappropriate to use Rule 7(f) to limit the government’s evidence or flesh out its prosecutorial theories in advance of trial. See Urso, 369 F. Supp. 2d at 272 (“As a general rule, a defendant is not entitled to receive details of the government’s conspiracy allegations in a bill of particulars.”); see also United States v. Barret, 824 F. Supp. 2d 419, 439 (E.D.N.Y. 2011) (“[T]he court is mindful that it cannot compel the government to disclose, through a bill of particulars, the manner in which it will attempt to prove the charges, the precise manner in which a defendant committed the crime charged, or to give a preview of its evidence and legal theories”) (quotations and citations omitted); United States v. Ianniello, 621 F. Supp. 1455, 1478 (S.D.N.Y. 1985) (“To require most of the further disclosure the defendants seek would do little more than restrict the government’s proof at trial, which is not the purpose of a bill of particulars.”); United States v. Albunio, No. 91-CR-0403, 1992 WL 281037, at \*2 (E.D.N.Y. Sept. 9, 1992) (“The defendant’s right to know the crime with which he is charged must be distinguished from his right to know the

evidentiary details by which proof of his culpability will be established.”). Ultimately, “[t]he applicable standard for whether a bill of particulars should issue is not whether the information would be helpful to the defense, but whether it is necessary.” United States v. Taylor, 17 F. Supp. 3d 162, 178 (E.D.N.Y. 2014); id. at 178-79 (noting that “[a] bill of particulars may not be used by the defense as a fishing expedition or to force the government to reveal all its evidence before trial,” and denying defendant’s motion for bill of particulars); United States v. Aliperti, 867 F. Supp. 142, 148 (E.D.N.Y. 1994). Consequently, a motion for a bill of particulars must be denied where it would “unduly restrict the government’s ability to present its case.” United States v. Baez, 62 F. Supp. 2d 557, 559 (D. Conn. 1999). In short, it is well-settled that “[t]he government may not be compelled to provide a bill of particulars disclosing the manner in which it will attempt to prove the charges, the precise manner in which the defendant committed the crimes charged, or a preview of the Government’s evidence or legal theories.” United States v. Carpenter, No. 18-CR-362 (ADS), 2018 WL 6933160, at \*6 (E.D.N.Y. Dec. 28, 2018).

Following this general principle, the law does not require, for example, that the government provide the precise conduct or roles played by the defendant or his co-conspirators. See, e.g., United States v. Jones, 1986 WL 275, at \*2 (S.D.N.Y. 1986) (“the government is under no obligation to disclose the specific role played by a defendant in a conspiracy, or the particular acts each defendant is alleged to have participated in, had knowledge of, or for which he is being held responsible”). Nor is the defendant entitled to discover through a bill of particulars the specific dates, times and locations of a crime, or the identities of witnesses or documents that will establish the charged crime. See United States v. Persico, 621 F. Supp. 842, 868 (S.D.N.Y. 1985). Such requests have been deemed little more than “impermissible attempts to force the government to particularize all of its evidence.” United States v. Cephas, 937 F.2d 816, 823 (2d Cir. 1991);

see also United States v. Facciolo, 753 F. Supp. 449, 451 (S.D.N.Y. 1990), aff'd, 968 F.2d 242 (2d Cir. 1992); United States v. Lorenzano, No. 03-1256 (S-6)(JFK), 2005 WL 975980, at \*3 (S.D.N.Y. 2005); United States v. Berganza, No. 03-987 (S-4)(DAB), 2005 WL 372045, at \*5 (S.D.N.Y. 2005); United States v. Mitlof, 165 F. Supp. 2d 558, 569 (S.D.N.Y. 2001) (denying request for bill of particulars where defendant sought details of the “wheres, whens and with whoms” that courts have held to be beyond the scope of a bill of particulars) (citations omitted).

There are three reasons animating these restrictions on the use of bills of particulars. First, the use of bills of particulars “is not comparable to discovery in civil [cases] because of the nature of the issues, the danger of intimidation of witnesses, and the greater danger of perjury and subornation of perjury.” Persico, 621 F. Supp. at 868 (internal quotation marks and citations omitted). Second, the government must not be compelled “to give a preview of its evidence and legal theories lest the defendant tailor his testimony to explain away the [g]overnment’s case.” United States v. Jimenez, 824 F. Supp. 351, 363 (S.D.N.Y. 1993) (citations omitted). Finally, the government should not be restricted from “using proof it may develop as the trial approaches.” Id. (citation omitted).

#### B. Discussion

The defendants have received sufficient notice of the charged offenses to adequately prepare for trial and no bill of particulars is warranted. They received specific notice via a detailed speaking Indictment and detention memoranda as well as voluminous, organized discovery pursuant to Rule 16. Given that nearly a year remains between now and trial, the defense will have abundant opportunity to review that discovery. Moreover, the government anticipates disclosing trial exhibits and witness material pursuant to 18 U.S.C. § 3500 well in advance of trial.

Notably, in their motion, the defendants nowhere identify exactly what particulars they seek. This lack of specificity reveals the motion for what it is—an improper fishing expedition seeking “a preview of the government’s evidence and legal theories.” Carpenter, 2018 WL 6933160, at \*6. The absence of any specifics in their request is just one aspect that starkly distinguishes this case from those cited by the defense, in which defendants requested, or Courts required, narrowly defined particulars to assist the defense in distinguishing transactions or claims the government alleged were criminal from very similar transactions or claims that were legitimate. See Bortnovsky, 820 F. 2d at 574 (defendants sought bill of particulars identifying which insurance claims the government alleged were fraudulent and which, of a series of robberies, the government alleged were falsely claimed in support of insurance claims); United States v. Hawit. No. 15-CR-252 (PKC), 2017 WL 663542, at \*11 (E.D.N.Y. Feb. 17, 2017) (requiring government to supply a list of transactions that the government “will seek to prove were tainted by the [charged] conspiracy”); United States v. Nachamie, 91 F. Supp. 2d 565, 574 (S.D.N.Y. 2000) (requiring government to supply disclosure identifying which of many medicare fraud claims it will allege to be fraudulent at trial).

Anticipating that the defendants will, on reply, identify for the Court the particulars that they seek, the government contacted defense counsel and asked them to identify what particulars they were seeking via the instant motion. Defense counsel advised that they request disclosure of the information outlined in their July 2023 letter to the government, attached as Exhibit A to their motion. This letter was sent approximately one month after the unsealing of the Indictment and before the bulk of the discovery in this case was produced. It is not credible for

the defendants to claim that receiving terabytes of material and substantial disclosures from the government has failed to advance their understanding of the charges beyond the understanding they had in July 2023.

Moreover, in that letter the defendants seek exactly the sort of “whos, whats, whens and wheres,” that are not appropriately supplied through a bill of particulars. United States v. Mitlof, 165 F. Supp. 2d 558, 569 (S.D.N.Y. 2001) (denying request for bill of particulars where defendant sought details of the “wheres, whens and with whoms” that courts have held to be beyond the scope of a bill of particulars) (citations omitted). Specifically, the defendants seek, in summary:

- 1) A list of all co-conspirators, including “when, where and with whom” they joined the conspiracy;
- 2) A list of all over acts committed in furtherance of the conspiracy;
- 3) A list of each act of labor the government alleges was obtained in violation of the substantive offense of forced labor, including who performed it, where it was performed, when it was performed, and how it was coerced or forced;
- 4) For each abusive and manipulative tactic employed in furtherance of the conspiracy, a list of who was subjected to it, where, when, and by whom, as well as a list of witnesses to the deployment of all such tactics;
- 5) For each abusive employment practice employed in furtherance of the conspiracy, a list of who was subjected to it, where, when and by whom, as well as a list of witnesses to the deployment of such practices;

- 6) Identification of the specific means of force used in connection with the charged conspiracy, including who was subjected to it, where, when and by whom, as well as a list of witnesses to the use of force;
- 7) A list of each individual directed to engage in sexual activity as part of their employment, and information as to when, where and by whom they were so directed; and a list of witnesses to each occasion when such a direction was issued; and
- 8) A list of each individual who was subjected to public shame, humiliation and workplace retaliation, when, where and by whom, and a list of witnesses to each occasion when such an incident occurred.

This proposed list of particulars suffers from two striking defects applicable to nearly each category. First, the government has not charged a substantive offense. Accordingly, it need not prove that any individual was, in fact, at any time and at any location, subjected to force, directed to engage in sexual activity, or the target of abusive and manipulative tactics. Second, the list repeatedly seeks premature disclosure of the government's witnesses. A bill of particulars is not an appropriate tool for obtaining a list of witnesses, and a year in advance of trial is far too early for disclosure of such a list in any event. United States v. Mandell, 710 F. Supp. 2d 368, 384 (S.D.N.Y. 2010) ("A bill of particulars . . . should not function to disclose evidence, witnesses, and legal theories to be offered by the government.") (citing United States v. Henry, 861 F. Supp. 1190, 1197 (S.D.N.Y. 1994) (internal quotation marks omitted); United States v. Ojeikere, 299 F. Supp. 2d 254, 258 (S.D.N.Y. 2004) ("A defendant is not automatically entitled as a matter of right or under the Federal Rules of Criminal Procedure to a list of the names and addresses of the government's witnesses prior to trial.")).



Further, the law is clear that the government need not identify all overt acts committed in furtherance of a conspiracy to the defense. “It is well-settled that there is no general requirement that the government disclose in a bill of particulars all the overt acts it will prove in a conspiracy charge.” Shteyman, 2011 WL 2006291 at \*5 (quoting Nachamie, 91 F. Supp. 2d at 575) (quotation marks omitted); see also Jimenez, 824 F. Supp. at 363.

With regard to the defendants’ request for co-conspirator information, the law does not entitle the defense to those details either. In deciding whether to grant requests for the identities of unindicted co-conspirators, courts in this Circuit have considered the following six factors: (1) the number of co-conspirators; (2) the duration and breadth of the alleged conspiracy; (3) whether the government has otherwise provided adequate notice of the particulars; (4) the volume of pre-trial disclosures; (5) the potential danger to co-conspirators; and (6) the potential harm to the government’s investigation. Nachamie, 91 F. Supp. 2d at 572. Applying this standard, courts in this District have consistently held that the identities of co-conspirators are beyond the proper scope and function of a bill of particulars. See United States v. Shkreli, No. 15-CR-637 (KAM), 2016 WL 8711065, at \*4-6 (E.D.N.Y. Dec. 14, 2016) (denying request for identities of unindicted co-conspirators in complex, multi-year financial fraud case); United States v. Barrera, 950 F. Supp. 2d 461, 476-79 (E.D.N.Y. 2013) (WFK) (defendant not entitled to bill of particulars identifying unnamed co-conspirators in RICO case with predicate acts of conspiracy to murder and attempted murder); Raniere, 384 F.Supp.3d at 323-4 (denying a bill of particulars, including request for unindicted co-conspirator information); United States v. Messina, No. 11-CR-31 (KAM), 2012 WL 463973, at \*10-11 (E.D.N.Y. Feb. 13, 2012) (denying request for the identification of unindicted co-conspirators in an eight-count indictment charging a racketeering conspiracy, loansharking and illegal gambling); United States v. Persing, No. 06-CR-815 (BMC),

2008 WL 11344620, at \*3-4 (E.D.N.Y. May 6, 2008) (denying request for identities of unindicted co-conspirators in 16-count indictment charging the defendant with conspiring to distribute and possess with intent to distribute Vicodin and RICO conspiracy, including predicate acts of extortionate collection of credit and extortion, and parallel substantive counts); United States v. Mason, No. 06-CR-80 (NRB), 2007 WL 541653, at \*4-5 (denying motion for the identification of all co-conspirators in connection with indictment charging ten defendants in seven-year narcotics conspiracy). Finally, “the refusal of a district court to direct the filing of a bill of particulars as to the names of unindicted co-conspirators is not an abuse of discretion.” United States v. Aliperti, 867 F. Supp. 142, 148-49 (E.D.N.Y. Nov. 4, 1994).

The defendants request that the government to provide a detailed preview of its trial evidence and theories of liability, including the location where each act of forced labor was performed and by whom, information regarding the scheme’s victims, including each act of force, coercion or abuse each individual was subject to, when, where and by whom. These requests should all be denied as overbroad. “It is not the function of a bill of particulars to allow defendants to preview the evidence or theory of the government’s case.” United States v. Gibson, 175 F. Supp. 2d 532, 537 (S.D.N.Y. 2001) (citing United States v. Perez, 940 F. Supp. 540, 550 (S.D.N.Y. 1996)); United States v. Rivera, No. 09-CR-619 (SJF), 2011 WL 1429125, at \*8 (E.D.N.Y. Apr. 13, 2011); see also United States v. Chen, 378 F.3d 151, 163 (2d Cir. 2004) (upholding the denial of a bill of particulars as to the “exact time and place of each alleged act associated with each offense identified in the indictment”).

Nevertheless, in an effort to resolve this request and ensure the defendants have more than sufficient information to prepare for trial, the government provides the following details regarding the nature of the charged conspiracy. The defendants are charged with conspiring to

obtain the labor and services of a group of OneTaste members through the various coercive means described in Paragraphs 6-12 of the Indictment. The government anticipates presenting evidence at trial proving that the object of the conspiracy was to obtain the following forms of labor and services from the group of OneTaste members:

- Domestic services (cooking, cleaning) provided to Daedone and others at the direction of the conspirators;
- Administrative and personal assistant services to Daedone, OneTaste and other OneTaste employees;
- Sexual services to customers and potential customers, investors and potential investors, as well as certain other members and employees of OneTaste;
- Sales and recruitment work on behalf of OneTaste;
- Video and website production on behalf of OneTaste;
- Operating certain OneTaste locations and services, such as its massage parlors;
- Event planning, operations and management relating to OneTaste courses, retreats, scenes, and other events; and
- Instruction, tutorials, presentations and coaching about OneTaste's philosophy and practices, to include orgasmic meditation.

Given the detail in the Indictment, the abundant discovery provided by the government, and information provided herein, the defendants are fully able to prepare for trial, avoid surprise and interpose a plea of double jeopardy should they be prosecuted a second time for the same offense.



# **EXHIBIT D3**

----- Forwarded message -----

From: **Louisa West** [REDACTED]  
Date: Thu, Oct 27, 2022 at 5:15 PM  
Subject: Dear Ayries <3 love Louisa  
To: [REDACTED]

Dearest Ayries,

I want to reach out to tell you some things that have been going on, which I want to connect with you about, and at least come clean so that I feel in integrity with our friendship.

First of all, I told OneTaste's lawyer - and I signed a statement saying - that you told me you broke the NDA. I don't know if you remember telling me you broke it, we were in a tent at Oregon Eclipse. I am very sad about this whole situation and that I had to do that. I do not want you to get in trouble, and OneTaste's lawyers promised me that they would not go after you in retaliation with this information, that they would only defend themselves.

More importantly, I want to reach out and say that I am your friend and I am your sister, even if we haven't spoken for years. I am worried about you. I know what it's like to be angry and hurt with people you once loved, to regret decisions you made, to feel taken advantage of. And I honor your feelings. I love you. I don't know how much of what the media is reporting is coming from you - but I know at least some of it. And darling beautiful badass woman, you don't need to keep doing this. You can heal from this. You know that the people in OneTaste still love you? They still love you crazy madly deeply. You're Ayries, how could they not?

Sweetheart I wish you could feel the love in my voice but I couldn't find a way to send you a voice note. So this will have to suffice. The FBI is too far. It's not fair, it's not right, crimes were not committed. Nicole is not a criminal. Neither is Rachel. They all agree that things were far from perfect within the organization, but it is unfair that they are being subjugated to criminal accusations.

I invite you to talk to me, please, as a friend. If you so desire I will not say a word to anyone about our conversation. But I don't know darling, it's worrying me, the whole thing, the way these lies have been spun. It's not right. We need to clean this up. There is already enough pain in the world.

Let me help you help me help all of us <3 please  
Love you always,  
Your fiery sister

Louisa

PS. Whatsapp & signal : [REDACTED]

# **EXHIBIT D4**

----- Forwarded message -----

From: **Summer Engman** [REDACTED]  
Date: Sat, Oct 29, 2022 at 12:05 AM  
Subject: Hi friend  
To: Ayries Blanck [REDACTED]

Hey Ayries,

There is a lot going on that I feel that I need to fill you in on. In the last couple of weeks I have become aware that the footage that was sold to Netflix likely included a lot of my time in OT and that I might be in the documentary. Appearing in this documentary would go against my personal interests and could really jeopardize the business I've built... especially seeing the trailers come out under the genre of True Crime. Being associated with an allegedly criminal organization is damaging to me and hundreds of other people who have moved on and created lives, families, and businesses on the heels of our onetaste experiences.

So I have signed the petition to Netflix to cease and desist, and I have been talking to a lot of people and have become willing and ready to talk to the media as well. Because so far what has been depicted in the media feels false. The allegations of rape and sexual assault... I never heard about them before they came out in the media. For all the years you and I have been friends, you never once mentioned them to me. I haven't pressed you about it because I haven't paid particular attention and didn't much care, but the stakes are higher than ever now. And I don't want to see people charged for crimes that did not happen. I care about the truth.

I had a conversation yesterday with Louisa and Maya because during the time of the alleged events, the time leading up to your departure, and the time after, I think the three of us together have a pretty well rounded perspective. We were all close to you during different parts of the timeline and we spoke in order to try and fill each other in, understand what we were missing, etc. What we found in speaking to each other is that we all three had heard basically the same story from you, and that you'd never told any of us about the serious allegations covered in the media.

In the absence of communication with you, the best I can do is to look at as much evidence as possible and try to discern the truth, relying predominantly on my own experience and observations.

I wanted to be the one to tell you that I am speaking out on this. I want you to know that I am not against you. I've always had your back. But I don't think these things happened as reported and I think that leaving these allegations unchecked has been hugely irresponsible on your part. There are grave consequences for allegations of this nature. So I can't just stand by. It's gotten out of control...

And the last thing I will say is that I have become privy to the behind the scenes at onetaste and they have spent the last several years organizing everything they have (which is a LOT) into chronological order, and aligning it all with the timeline of events as portrayed in the media. They have talked to countless people who were there during that time. And all of this evidence combined makes it crystal clear that the allegations are simply false. And in order to prove this they are going to have to share a lot of material that I promise you... you do not want coming out. It's devastating, Ayries. I do not want you to go through this. Yes, I have personal interest in not having this Netflix Doc come out, but I think you especially should be doing everything in your power to prevent the media storm that is about to sweep you up and take over your life.

Netflix has made it clear that they are taking all the past media pieces as established fact and that they will not vet any of the supporting evidence. So if any of those past allegations are retracted, Netflix has to withdraw or re-edit. And this avoids a flurry of inevitably ensuing lawsuits of which you will no doubt be a central figure.

I'm here if you want to talk. Happy to do anything I can to help. I love you.

**Summer Engman**



# **EXHIBIT D5**

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**From:** Elliot McGinnis [REDACTED]  
**Sent:** Wed 11/9/2022 10:27:33 PM (UTC)  
**To:** Ares M [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

Ok I will take a look into and see what I can find

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**From:** Ares M [REDACTED]  
**Sent:** Wednesday, November 9, 2022 4:37:34 PM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

I don't have a copy.

Ellen huet just sent the case number and this info to me as it's what she found in the Bloomberg data base.

I asked her if she could send me files and she said she could send just this info.

But she said it did say "pending" and it seems it might not have been filed yet.

I didn't talk in depth. She sent me the notice and asked if I knew and I said no and asked if she could send more info on it and that's what she sent.

On Wed, Nov 9, 2022 at 9:29 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, are you named in the lawsuit? Also, do you have a copy?

---

**From:** Ares M [REDACTED]  
**Sent:** Wednesday, November 9, 2022 2:39:14 PM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

It's "pending"

On Wed, Nov 9, 2022 at 7:15 PM Ares M [REDACTED] wrote:

Here is the info for the case that Onetaste filed. it seems to be "pending" but not sure what that actually means.

CA Superior Court Los Angeles  
Docket for case # 22STCV33093  
Lawyer: Mick Pherson

On Tue, Nov 8, 2022 at 5:22 PM Ares M [REDACTED] wrote:

does 5 minutes work for you?

On Tue, Nov 8, 2022 at 5:17 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, I'm available now if you want to call. [REDACTED].

---

**From:** Ares M [REDACTED]  
**Sent:** Tuesday, November 8, 2022 8:49 AM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

that works. If we can do it earlier it would be better but that works.

On Tue, Nov 8, 2022 at 1:42 PM Elliot McGinnis [REDACTED] wrote:

Would 1pm EST be too late for you?

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**From:** Ares M [REDACTED]  
**Sent:** Tuesday, November 8, 2022 8:30:06 AM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

What time roughly would we do the call at? It might be easier again if I call you from my google voice number on the office phone like we did last time.

Best,

On Tue, Nov 8, 2022 at 12:51 PM Elliot McGinnis [REDACTED] wrote:

I would cancel it if it's only bringing emails like the ones attached. It really serves you know purpose other than making you feel uneasy.

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**From:** Ares M [REDACTED]  
**Sent:** Tuesday, November 8, 2022 7:46:33 AM

**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

Should I disband and cancel that email? I've been keeping it open for any kind of stuff like this?

On Tue, Nov 8, 2022 at 12:43 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, I will be addressing these things with the AUSAs this morning. This is a top priority. I will get back to you later this morning. In the meantime I recommend blocking Louisa and Summer. Based on their statements in the emails they are still associated with Onetaste and I feel that they are rather manipulative in nature. Talk to you later today, Elliot

---

**From:** Ares M [REDACTED]  
**Sent:** Tuesday, November 8, 2022 3:49:20 AM

**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

Hey Elliot,

Yes, I am free today or tomorrow. Also I just learned IT has filed a lawsuit against me. I have actually not received anything from them. Onetaste found somebody who will say I broke my settlement agreement. I also sent you a bunch of other stuff they sent me.

On Mon, Nov 7, 2022 at 11:05 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, I hope all is well. Do you have a few moments to catch up this week? Elliot

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**From:** Ayries Blanc [REDACTED]

**Sent:** Monday, October 3, 2022 4:38:52 AM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

Hey Elliot,

I can talk anytime today. Today is better than tomorrow as I have calls with clients in my evening (your morning) tomorrow.

I can call you in that number whenever your free.

On Sun, Oct 2, 2022 at 11:37 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, Do you have a few minutes to talk this week? I'm available pretty much anytime Monday or Tuesday.

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**From:** Ayries Blanc [REDACTED]  
**Sent:** Saturday, October 1, 2022 1:02:51 PM

**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

Hello Elliot,

I wanted to reach out because somebody who I was close with (and left onetaste with a particularly bad experience) contacted me today via facebook messenger. I had thought nobody was able to contact me anymore but I think since I had not blocked her as a facebook friend (since she left with a very traumatic experience) she was able to message me.

She informed me that Eli Block (who she has not spoken to in 8+ years - as she informed me) called her. He talked with her a bit and asked her if she would give a verbal or written testimony refuting and denying things in my story, things bloomberg said, as well as things said in thh BBC podcast. He told her Nicole was close to wrongfully going to jail and that the BBC was spreading lies. Basically that if she would give this testimony against my allegations, bbc, and Nicole that she could "save nicole from prison". She sent this to me over a voice message on facebook messenger. Nicole also called her and left a voice message wanting to chat with her.

She, Joshanna, also mentioned that you guys had contacted her but she had previously avoided getting involved so far. She didn't send anything threatening to me, more that she was concerned and wanted to reach out and know what I thought and that it felt dubious that Eli was reaching out, especially since she did not have a good relationship with him at onetaste.

But it does seem like they have started to call even more people wider in the net asking if they would offer testimony refuting things that have happened to me, bbc, and so forth because Johanna Wechsler left with a very bad and traumatic experience with them it also seems they are telling people that Nicole is close to being wrongfully arrested and going to jail.

I am not sure if this helps or is important but I thought I should let you know.

Best,

On Fri, Aug 19, 2022 at 5:18 PM Ayries Blanc [REDACTED] wrote:

Should I try again now?

On Fri, Aug 19, 2022 at 5:18 PM Ayries Blanc [REDACTED] wrote:

Just called back

On Fri, Aug 19, 2022 at 5:11 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, I just tried calling. Give me a call when you can I'm free the rest of the day.

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**From:** Ayries Blanc [REDACTED]  
**Sent:** Friday, August 19, 2022 7:40:33 AM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** Re: [EXTERNAL EMAIL] - More Messages

If I don't answer email me here and I'll call you. Sometimes it seems the calls don't come through with google voice

On Thu, Aug 18, 2022 at 11:20 PM Ayries Blanc [REDACTED] wrote:

On Thu, Aug 18, 2022 at 11:10 PM Ayries Blanc [REDACTED] wrote:

or you could call me as well

On Thu, Aug 18, 2022 at 11:10 PM Ayries Blanc [REDACTED] wrote:

Hey Elliot,

I am free now if that works for you.

would you want to do zoom or google meet?

On Thu, Aug 18, 2022 at 11:01 PM Elliot McGinnis [REDACTED] wrote:

Hi Ayries, I'm conferring with the AUSAs regarding these messages and the best way to address them. Can we talk? Im free anytime. Elliot 9173637148

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**From:** Ayries Blanc [REDACTED]  
**Sent:** Thursday, August 18, 2022 5:17 PM  
**To:** McGinnis, Elliot C. (NY) (FBI) [REDACTED]  
**Subject:** [EXTERNAL EMAIL] - More Messages

Hey Elliot,

So I never talked on the bbc podcast or anything but somebody reached out to me and told me that unless I basically go public and write to the BBC and state the things that happened are not true or accurate that they will release all these things publicly. I imagine this was what Nicole's Lawyers originally wanted to get onto the phone with me about.

What they would release publicly could be a wide range of things such as text messages of me saying certain things, images, or video. I am not really sure but it would all be framed to make me look like a liar.

The person who wrote me Summer- She originally helped me leave OT and has since left herself. She has gotten on the phone with Nicole's lawyers now. I am not sure if I should get on the phone with her to find out what they talked to her about BUT she is also the same person Ravi my ex sent a threat to me through a few months back saying if i ever mentioned him in anything he would sue me for defamation.

Basically they are using her to send me veiled threats. I am not sure if this is how these things work and I should ignore it like all the other stuff or I should get legal counsel and talk with them. I do know the lawyers OT has are the



same lawyers prince andrew used - which you might already know and Karen mentioned they can use tactics like this to rattle witnesses/victims.

Anyway I thought I should share as OT seems to be getting as close to me as they can and contacting + threatening people who I could be close with.

# **EXHIBIT D6**

1 Edwin F. McPherson – State Bar No. 106084  
2 Pierre B. Pine – State Bar No. 211299  
3 **McPHERSON LLP**  
4 1900 Avenue of the Stars  
5 25th Floor  
6 Los Angeles, CA 90067  
7 Tel:(310)553-8833  
8 Fax:(310)553-9233

9 Attorneys for Plaintiff ONETASTE INCORPORATED

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

13 ONETASTE INCORPORATED, a  
14 California corporation,

15 Plaintiff,

16 vs.

17 AYRIES BLANCK, an individual; and  
18 DOES 1 through 100, inclusive,

19 Defendants.

CASE NO. 22STCV33093

[Assigned For All Purposes To  
Hon. Rupert A. Byrdsong - Dept. 28]

Complaint Filed: October 7, 2022

Trial Date: June 10, 2024  
FSC: May 31, 2024  
DISC. C/O: May 10, 2024

**RESPONSES OF PLAINTIFF  
ONETASTE INCORPORATED TO  
REQUEST FOR PRODUCTION (SET  
ONE) OF DEFENDANT AYRIES  
BLANCK**

20 PROPOUNDING PARTY: Defendant AYRIES BLANCK

21 RESPONDING PARTY: Plaintiff ONETASTE INCORPORATED

22 SET NO: ONE

23  
24 TO DEFENDANT AYRIES BLANCK AND TO HIS ATTORNEYS OF RECORD IN  
25 THE CAPTIONED ACTION:

26 Plaintiff ONETASTE INCORPORATED (hereinafter “Plaintiff”), hereby responds to the  
27 Request For Production of Documents (Set No. One) of Defendant AYRIES BLANCK  
28 (hereinafter “Defendant”) as follows:

1 Plaintiff's discovery and investigation are ongoing and are not yet completed. The  
2 responses herein are based only upon the information currently available to date and Plaintiff's  
3 current contentions. Plaintiff reserves its right, without any obligation, to amend these responses  
4 as new information becomes available and/or as Plaintiff revises its contentions.  
5

### 6 **GENERAL OBJECTIONS AND DEFINITIONS**

7 The following General Objections shall apply to each of the Defendant's Requests:

8 1. Plaintiff objects to any instructions and/or demands contained within Defendant's  
9 Requests to the extent they purport to impose obligations beyond those imposed by the Code of  
10 Civil Procedure, and relevant case law.

11 2. Plaintiff objects to each of the Requests to the extent it calls for any documents or  
12 any information contained therein that are covered by the attorney-client privilege, or which  
13 constitute attorney work product, or that are otherwise protected from disclosure

14 3. Plaintiff objects to each of the Requests to the extent that it seeks confidential  
15 and/or proprietary information.

16 4. Plaintiff objects to each of the Requests to the extent that it seeks production of  
17 documents that are neither relevant to any material issue in the case nor reasonably calculated to  
18 lead to the discovery of admissible evidence.

19 5. Plaintiff objects to each of the Requests to the extent that it seeks the production of  
20 documents or other information that is not in the possession, custody, or control of Plaintiff.

21 6. Plaintiff objects to each of the Requests to the extent that it seeks the production of  
22 documents or other information without any reference or limit to the span of time.

23 7. Plaintiff objects to each of the Requests to the extent that it seeks discovery of  
24 documents that are in the public domain, or that can be obtained by Defendant by other means,  
25 including by requesting such documents from a party to the case. In that regard, the Requests  
26 are burdensome and excessive.

27 ///

28 ///

1 8. Plaintiff objects to Defendant's Requests as a whole to the extent that they are  
2 overbroad, cumulative, unduly burdensome, vexatious, oppressive, or intended to harass, rather  
3 than lead to the discovery of evidence related to a bona fide dispute between the parties.

4 9. Plaintiff reserves the right to modify and supplement its Responses and Objections  
5 to Defendant's Subpoena, and each of the Requests therein, and the production of any  
6 documents pursuant to the Subpoena shall not be construed as a waiver of that right.

7 10. An inadvertent production of any privileged or objectionable document shall not  
8 be deemed a waiver of such privilege or objection.

9  
10 **RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION**

11 In addition to the foregoing Objections, which are incorporated herein by reference, apply  
12 to each Request as if set forth fully below, Plaintiff makes the following specific Objections and  
13 Responses:

14  
15 **REQUEST FOR PRODUCTION NO. 1:**

16 All DOCUMENTS related to Ayries Blanck from August 20, 2015 to present.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

18 Objection. Plaintiff objects to this Request for the reasons stated in its General  
19 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
20 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
21 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
22 being overly broad in scope, and vague and ambiguous as to any specific subject matter, as to  
23 make any response unduly burdensome on Plaintiff. Plaintiff further objects to this Request as  
24 being vague and ambiguous as to the meaning of the term "related." Plaintiff further objects to  
25 this Request to the extent that it seeks or requires the disclosure of documents that are not  
26 relevant to the subject matter of this action, and are not reasonably calculated to lead to the  
27 discovery of admissible evidence or are otherwise not within the scope of discovery as provided  
28 by the Code of Civil Procedure. Plaintiff further objects to this Request to the extent it seeks or

1 requires a response and the production of documents that are protected from disclosure by any  
2 privilege, including but not limited to, the attorney-client privilege and/or protected from  
3 disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to this Request on  
4 the grounds that it seeks or requires the production of documents that are already in Defendant's  
5 possession and/or otherwise equally available to Defendant. Subject to and without waiving said  
6 objections, Plaintiff responds as follows:

7         Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
8 possession, custody, and/or control.

9  
10 **REQUEST FOR PRODUCTION NO. 2:**

11         All non-privileged DOCUMENTS related to YOUR execution of the SETTLEMENT  
12 AGREEMENT from August 20, 2015 to present.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

14         Objection. Plaintiff objects to this Request for the reasons stated in its General  
15 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
16 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
17 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
18 being overly broad in scope, and vague and ambiguous as to the meaning of the term "related."  
19 Plaintiff further objects to this Request to the extent it seeks or requires a response and the  
20 production of documents that are protected from disclosure by any privilege, including but not  
21 limited to, the attorney-client privilege and/or protected from disclosure by the Attorney Work  
22 Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or requires  
23 the production of documents that are already in Defendant's possession and/or otherwise equally  
24 available to Defendant. Subject to and without waiving said objections, Plaintiff responds as  
25 follows:

26         Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
27 possession, custody, and/or control.

1 **REQUEST FOR PRODUCTION NO. 3:**

2 All DOCUMENTS related to YOUR settlement with Ayries Blanck from August 20, 2015 to  
3 present.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

5 Objection. Plaintiff objects to this Request for the reasons stated in its General  
6 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
7 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
8 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
9 being overly broad in scope, and vague and ambiguous as to the meaning of the term “related.”  
10 Plaintiff further objects to this Request to the extent it seeks or requires a response and the  
11 production of documents that are protected from disclosure by any privilege, including but not  
12 limited to, the attorney-client privilege and/or protected from disclosure by the Attorney Work  
13 Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or requires  
14 the production of documents that are already in Defendant’s possession and/or otherwise equally  
15 available to Defendant. Subject to and without waiving said objections, Plaintiff responds as  
16 follows:

17 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
18 possession, custody, and/or control.

19  
20 **REQUEST FOR PRODUCTION NO. 4:**

21 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT posted  
22 negative comments about YOU “in the comment section of an online Dame article on OneTaste.”

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

24 Objection. Plaintiff objects to this Request for the reasons stated in its General  
25 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
26 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
27 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
28 being overly broad in scope, and vague and ambiguous as to the meaning of the term “related.”

1 Plaintiff further objects to this Request to the extent it seeks or requires a response and the  
2 production of documents that are protected from disclosure by any privilege, including but not  
3 limited to, the attorney-client privilege and/or protected from disclosure by the Attorney Work  
4 Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or requires  
5 the production of documents that are already in Defendant's possession and/or otherwise equally  
6 available to Defendant. Subject to and without waiving said objections, Plaintiff responds as  
7 follows:

8 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
9 possession, custody, and/or control.

10  
11 **REQUEST FOR PRODUCTION NO. 5:**

12 All DOCUMENTS related to ANY alleged oral statements DEFENDANT made in violation  
13 of the SETTLEMENT AGREEMENT.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

15 Objection. Plaintiff objects to this Request for the reasons stated in its General  
16 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
17 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
18 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
19 being overly broad in scope, and vague and ambiguous as to the meaning of the term "related."  
20 Plaintiff further objects to this Request to the extent it seeks or requires a response and the  
21 production of documents that are protected from disclosure by any privilege, including but not  
22 limited to, the attorney-client privilege and/or protected from disclosure by the Attorney Work  
23 Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or requires  
24 the production of documents that are already in Defendant's possession and/or otherwise equally  
25 available to Defendant. Subject to and without waiving said objections, Plaintiff responds as  
26 follows:

27 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
28 possession, custody, and/or control.



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

2 All DOCUMENTS related to ANY alleged written statements DEFENDANT made in  
3 violation of the SETTLEMENT AGREEMENT.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

5 Objection. Plaintiff objects to this Request for the reasons stated in its General  
6 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
7 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
8 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
9 being overly broad in scope, and vague and ambiguous as to the meaning of the term “related.”  
10 Plaintiff further objects to this Request to the extent it seeks or requires a response and the  
11 production of documents that are protected from disclosure by any privilege, including but not  
12 limited to, the attorney-client privilege and/or protected from disclosure by the Attorney Work  
13 Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or requires  
14 the production of documents that are already in Defendant’s possession and/or otherwise equally  
15 available to Defendant. Subject to and without waiving said objections, Plaintiff responds as  
16 follows:

17 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
18 possession, custody, and/or control.

19  
20 **REQUEST FOR PRODUCTION NO. 7:**

21 Any DOCUMENTS that YOU believe support YOUR claim that information in the June 18  
22 Bloomberg Article, “The Dark Side of the Orgasmic Meditation Company” was obtained directly  
23 from DEFENDANT.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

25 Objection. Plaintiff objects to this Request for the reasons stated in its General  
26 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
27 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
28 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to

1 the extent it seeks or requires a response and the production of documents that are protected  
2 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
3 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
4 this Request on the grounds that it seeks or requires the production of documents that are already  
5 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
6 without waiving said objections, Plaintiff responds as follows:

7 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
8 possession, custody, and/or control.

9  
10 **REQUEST FOR PRODUCTION NO. 8:**

11 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT "told one of  
12 her closest friends that she was talking to the press about her experience with OneTaste" as stated in  
13 Paragraph 53 of the FIRST AMENDED COMPLAINT.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

15 Objection. Plaintiff objects to this Request for the reasons stated in its General  
16 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
17 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
18 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
19 the extent it seeks or requires a response and the production of documents that are protected  
20 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
21 protected from disclosure by the Attorney Work Product Doctrine. Subject to and without  
22 waiving said objections, Plaintiff responds as follows:

23 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
24 possession, custody, and/or control.

25  
26 **REQUEST FOR PRODUCTION NO. 9:**

27 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT "shrugged,  
28 and said 'Whatever, I'm going to do what I want'" as stated in Paragraph 53 of the FIRST

1 AMENDED COMPLAINT.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

3 Objection. Plaintiff objects to this Request for the reasons stated in its General  
4 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
5 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
6 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
7 the extent it seeks or requires a response and the production of documents that are protected  
8 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
9 protected from disclosure by the Attorney Work Product Doctrine. Subject to and without  
10 waiving said objections, Plaintiff responds as follows:

11 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
12 possession, custody, and/or control.

13  
14 **REQUEST FOR PRODUCTION NO. 10:**

15 Any DOCUMENTS that YOU believe support YOUR claim of the February 16, 2018 text  
16 message exchange between DEFENDANT and “one of her best friends” as stated in Paragraph 53 of  
17 the FIRST AMENDED COMPLAINT, including documents sufficient to identify the alleged friend.

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

19 Objection. Plaintiff objects to this Request for the reasons stated in its General  
20 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
21 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
22 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
23 the extent it seeks or requires a response and the production of documents that are protected  
24 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
25 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
26 this Request on the grounds that it seeks or requires the production of documents that are already  
27 in Defendant’s possession and/or otherwise equally available to Defendant. Subject to and  
28 without waiving said objections, Plaintiff responds as follows:

1 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
2 possession, custody, and/or control.

3  
4 **REQUEST FOR PRODUCTION NO. 11:**

5 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT texted a  
6 UK-based former OneTaste customer as stated in Paragraph 55 of the FIRST AMENDED  
7 COMPLAINT, including documents to identify the alleged former customer.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

9 Objection. Plaintiff objects to this Request for the reasons stated in its General  
10 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
11 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
12 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
13 the extent it seeks or requires a response and the production of documents that are protected  
14 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
15 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
16 this Request on the grounds that it seeks or requires the production of documents that are already  
17 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
18 without waiving said objections, Plaintiff responds as follows:

19 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
20 possession, custody, and/or control.

21  
22 **REQUEST FOR PRODUCTION NO. 12:**

23 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT "actually  
24 has her sister appear in the Netflix Film" as stated in Paragraph 61 of the FIRST AMENDED  
25 COMPLAINT.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

27 Objection. Plaintiff objects to this Request for the reasons stated in its General  
28 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further

1 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
2 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
3 the extent it seeks or requires a response and the production of documents that are protected  
4 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
5 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
6 this Request on the grounds that it seeks or requires the production of documents that are already  
7 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
8 without waiving said objections, Plaintiff responds as follows:

9 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
10 possession, custody, and/or control.

11  
12 **REQUEST FOR PRODUCTION NO. 13:**

13 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT violated the  
14 SETTLEMENT AGREEMENT.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

16 Objection. Plaintiff objects to this Request for the reasons stated in its General  
17 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
18 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
19 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
20 the extent it seeks or requires a response and the production of documents that are protected  
21 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
22 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
23 this Request on the grounds that it seeks or requires the production of documents that are already  
24 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
25 without waiving said objections, Plaintiff responds as follows:

26 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
27 possession, custody, and/or control.

28

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

2 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT participated  
3 in the Netflix Film.

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

5 Objection. Plaintiff objects to this Request for the reasons stated in its General  
6 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
7 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
8 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
9 the extent it seeks or requires a response and the production of documents that are protected  
10 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
11 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
12 this Request on the grounds that it seeks or requires the production of documents that are already  
13 in Defendant’s possession and/or otherwise equally available to Defendant. Subject to and  
14 without waiving said objections, Plaintiff responds as follows:

15 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
16 possession, custody, and/or control.

17  
18 **REQUEST FOR PRODUCTION NO. 15:**

19 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT “actually  
20 has her sister appear in the Netflix Film” as stated in Paragraph 61 of the FIRST AMENDED  
21 COMPLAINT.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

23 Objection. Plaintiff objects to this Request for the reasons stated in its General  
24 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
25 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
26 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
27 the extent it seeks or requires a response and the production of documents that are protected  
28 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or

1 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
2 this Request on the grounds that it seeks or requires the production of documents that are already  
3 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
4 without waiving said objections, Plaintiff responds as follows:

5 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
6 possession, custody, and/or control.

7  
8 **REQUEST FOR PRODUCTION NO. 16:**

9 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT spoke "to  
10 various journalists for various false and defamatory 'hit pieces' against OneTaste" as stated in  
11 Paragraph 90 of the FIRST AMENDED COMPLAINT.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

13 Objection. Plaintiff objects to this Request for the reasons stated in its General  
14 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
15 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
16 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
17 the extent it seeks or requires a response and the production of documents that are protected  
18 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
19 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
20 this Request on the grounds that it seeks or requires the production of documents that are already  
21 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
22 without waiving said objections, Plaintiff responds as follows:

23 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
24 possession, custody, and/or control.

25  
26 **REQUEST FOR PRODUCTION NO. 17:**

27 Any DOCUMENTS that YOU believe support YOUR claim that DEFENDANT "actually  
28 recruited people on behalf of the author of the Bloomberg article and Netflix Film (and perhaps

1 others) to falsely disparage Plaintiff’ as stated in Paragraph 90 of the FIRST AMENDED  
2 COMPLAINT.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

4           Objection. Plaintiff objects to this Request for the reasons stated in its General  
5 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
6 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
7 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
8 the extent it seeks or requires a response and the production of documents that are protected  
9 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
10 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
11 this Request on the grounds that it seeks or requires the production of documents that are already  
12 in Defendant’s possession and/or otherwise equally available to Defendant. Subject to and  
13 without waiving said objections, Plaintiff responds as follows:

14           Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
15 possession, custody, and/or control.

16  
17 **REQUEST FOR PRODUCTION NO. 18:**

18           Any DOCUMENTS that YOU believe support YOUR claim that YOU have been damaged  
19 by DEFENDANT.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

21           Objection. Plaintiff objects to this Request for the reasons stated in its General  
22 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
23 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
24 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
25 the extent it seeks or requires a response and the production of documents that are protected  
26 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
27 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
28 this Request on the grounds that it seeks or requires the production of documents that are already



1 in Defendant's possession and/or otherwise equally available to Defendant. Plaintiff further  
2 objects to this Request to the extent that it seeks or requires the production of documents that  
3 contain highly confidential financial information and information that is protected by Plaintiff's  
4 rights of privacy, including, but not limited to Plaintiff's right of privacy contained in Article I,  
5 Section I of the Constitution of the State of California, in the United States Constitution or any  
6 other applicable privilege or protection recognized under statute or applicable case law. Subject  
7 to and without waiving said objections, Plaintiff responds as follows:

8 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
9 possession, custody, and/or control.

10  
11 **REQUEST FOR PRODUCTION NO. 19:**

12 Any DOCUMENTS that YOU believe support YOUR claim that Plaintiff could not, in the  
13 exercise of reasonable diligence, have discovered Defendants' secret intentions as aforementioned"  
14 as stated in Paragraph 102 of the FIRST AMENDED COMPLAINT.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

16 Objection. Plaintiff objects to this Request for the reasons stated in its General  
17 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
18 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
19 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
20 the extent it seeks or requires a response and the production of documents that are protected  
21 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
22 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
23 this Request on the grounds that it seeks or requires the production of documents that are already  
24 in Defendant's possession and/or otherwise equally available to Defendant. Subject to and  
25 without waiving said objections, Plaintiff responds as follows:

26 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
27 possession, custody, and/or control.

28

1 **REQUEST FOR PRODUCTION NO. 20:**

2 All DOCUMENTS related to the “reasonable diligence”, as stated in Paragraph 102 of the  
3 FIRST AMENDED COMPLAINT, YOU conducted prior to entering into the SETTLEMENT  
4 AGREEMENT.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

6 Objection. Plaintiff objects to this Request for the reasons stated in its General  
7 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
8 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
9 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
10 the extent it seeks or requires a response and the production of documents that are protected  
11 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
12 protected from disclosure by the Attorney Work Product Doctrine. Subject to and without  
13 waiving said objections, Plaintiff responds as follows:

14 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
15 possession, custody, and/or control.

16  
17 **REQUEST FOR PRODUCTION NO. 21:**

18 All DOCUMENTS sufficient to show YOUR annual gross profits from 2015 to present.

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

20 Objection. Plaintiff objects to this Request for the reasons stated in its General  
21 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
22 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
23 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
24 the extent it seeks or requires a response and the production of documents that are protected  
25 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
26 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
27 this Request to the extent that it seeks or requires the production of documents that contain  
28 highly confidential financial information and information that is protected by Defendant’s rights

1 of privacy, including, but not limited to Plaintiff's right of privacy contained in Article I, Section  
2 I of the Constitution of the State of California, in the United States Constitution or any other  
3 applicable privilege or protection recognized under statute or applicable case law. Subject to  
4 and without waiving said objections, Plaintiff responds as follows:

5 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
6 possession, custody, and/or control.

7  
8 **REQUEST FOR PRODUCTION NO. 22:**

9 All DOCUMENTS sufficient to show YOUR annual net profits from 2015 to present.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

11 Objection. Plaintiff objects to this Request for the reasons stated in its General  
12 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
13 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
14 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
15 the extent it seeks or requires a response and the production of documents that are protected  
16 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
17 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
18 this Request to the extent that it seeks or requires the production of documents that contain  
19 highly confidential financial information and information that is protected by Defendant's rights  
20 of privacy, including, but not limited to Plaintiff's right of privacy contained in Article I, Section  
21 I of the Constitution of the State of California, in the United States Constitution or any other  
22 applicable privilege or protection recognized under statute or applicable case law. Subject to  
23 and without waiving said objections, Plaintiff responds as follows:

24 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
25 possession, custody, and/or control.

26  
27 **REQUEST FOR PRODUCTION NO. 23:**

28 YOUR tax returns from 2015 to present.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

2           Objection. Plaintiff objects to this Request for the reasons stated in its General  
3 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
4 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
5 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
6 the extent that it seeks or requires the disclosure of documents that are not relevant to the subject  
7 matter of this action, and are not reasonably calculated to lead to the discovery of admissible  
8 evidence or are otherwise not within the scope of discovery as provided by the Code of Civil  
9 Procedure. Plaintiff further objects to this Request to the extent it seeks or requires a response  
10 and the production of documents that are protected from disclosure by any privilege, including  
11 but not limited to, the attorney-client privilege and/or protected from disclosure by the Attorney  
12 Work Product Doctrine. Plaintiff further objects to this Request to the extent that it seeks or  
13 requires the production of documents that contain highly confidential financial information and  
14 information that is protected by Defendant's rights of privacy, including, but not limited to  
15 Plaintiff's right of privacy contained in Article I, Section I of the Constitution of the State of  
16 California, in the United States Constitution or any other applicable privilege or protection  
17 recognized under statute or applicable case law. Subject to and without waiving said objections,  
18 Plaintiff responds as follows:

19           Plaintiff will not produce any of its tax returns in response to this Request, which are  
20 privileged from disclosure (see Webb v. Standard Oil (1957) 49 Cal.2d 509, 512-513; Strawn v.  
21 Morris, Polich & Purdy (2019) 30 Cal.App. 5<sup>th</sup> 1087, 1098), and constitute highly confidential  
22 financial information and information that is protected by Defendant's rights of privacy,  
23 including, but not limited to Plaintiff's right of privacy contained in Article I, Section I of the  
24 Constitution of the State of California, in the United States Constitution. Moreover, the  
25 production of Plaintiff's tax returns is not necessary to calculate Plaintiff's estimated damages,  
26 and thus, this Request seeks the production of documents that are irrelevant and not reasonably  
27 calculated to lead to the discovery of admissible evidence, and is only meant to harass and create  
28 an undue burden on Plaintiff.

1  
2 **REQUEST FOR PRODUCTION NO. 24:**

3 All DOCUMENTS that YOU believe support YOUR claim for all damages YOU attribute to  
4 DEFENDANT.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

6 Objection. Plaintiff objects to this Request for the reasons stated in its General  
7 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
8 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
9 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
10 the extent it seeks or requires a response and the production of documents that are protected  
11 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
12 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
13 this Request to the extent that it seeks or requires the production of documents that contain  
14 highly confidential financial information and information that is protected by Defendant's rights  
15 of privacy, including, but not limited to Plaintiff's right of privacy contained in Article I, Section  
16 I of the Constitution of the State of California, in the United States Constitution or any other  
17 applicable privilege or protection recognized under statute or applicable case law. Subject to  
18 and without waiving said objections, Plaintiff responds as follows:

19 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
20 possession, custody, and/or control.

21  
22 **REQUEST FOR PRODUCTION NO. 25:**

23 All contracts related to "public relations firms" YOU hired as alleged in Paragraph 93 of the  
24 FIRST AMENDED COMPLAINT.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

26 Objection. Plaintiff objects to this Request for the reasons stated in its General  
27 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
28 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those

1 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request to  
2 the extent it seeks or requires a response and the production of documents that are protected  
3 from disclosure by any privilege, including but not limited to, the attorney-client privilege and/or  
4 protected from disclosure by the Attorney Work Product Doctrine. Plaintiff further objects to  
5 this Request to the extent that it seeks or requires the production of documents that contain  
6 highly confidential financial information and information that is protected by Defendant's rights  
7 of privacy, including, but not limited to Plaintiff's right of privacy contained in Article I, Section  
8 I of the Constitution of the State of California, in the United States Constitution or any other  
9 applicable privilege or protection recognized under statute or applicable case law. Subject to  
10 and without waiving said objections, Plaintiff responds as follows:

11           Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
12 possession, custody, and/or control.

13  
14 **REQUEST FOR PRODUCTION NO. 26:**

15           Any DOCUMENTS that YOU believe support YOUR responses to DEFENDANT'S Form  
16 Interrogatories, Set One.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

18           Objection. Plaintiff objects to this Request for the reasons stated in its General  
19 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
20 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
21 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
22 being overly broad in scope, and vague and ambiguous as to any specific subject matter, as to  
23 make any response unduly burdensome on Plaintiff. Plaintiff further objects to this Request to  
24 the extent that it seeks or requires the disclosure of documents that are not relevant to the subject  
25 matter of this action, and are not reasonably calculated to lead to the discovery of admissible  
26 evidence or are otherwise not within the scope of discovery as provided by the Code of Civil  
27 Procedure. Plaintiff further objects to this Request to the extent it seeks or requires a response  
28 and the production of documents that are protected from disclosure by any privilege, including

1 but not limited to, the attorney-client privilege and/or protected from disclosure by the Attorney  
2 Work Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or  
3 requires the production of documents that are already in Defendant's possession and/or  
4 otherwise equally available to Defendant. Subject to and without waiving said objections,  
5 Plaintiff responds as follows:

6 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
7 possession, custody, and/or control.

8  
9 **REQUEST FOR PRODUCTION NO. 27:**

10 Any DOCUMENTS that YOU believe support YOUR responses to DEFENDANT'S Special  
11 Interrogatories, Set One.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

13 Objection. Plaintiff objects to this Request for the reasons stated in its General  
14 Objections, which are incorporated by reference as though fully set forth herein. Plaintiff further  
15 objects to this Request to the extent it seeks to impose obligations on Plaintiff beyond those  
16 imposed by the California Code of Civil Procedure. Plaintiff further objects to this Request as  
17 being overly broad in scope, and vague and ambiguous as to any specific subject matter, as to  
18 make any response unduly burdensome on Plaintiff. Plaintiff further objects to this Request to  
19 the extent that it seeks or requires the disclosure of documents that are not relevant to the subject  
20 matter of this action, and are not reasonably calculated to lead to the discovery of admissible  
21 evidence or are otherwise not within the scope of discovery as provided by the Code of Civil  
22 Procedure. Plaintiff further objects to this Request to the extent it seeks or requires a response  
23 and the production of documents that are protected from disclosure by any privilege, including  
24 but not limited to, the attorney-client privilege and/or protected from disclosure by the Attorney  
25 Work Product Doctrine. Plaintiff further objects to this Request on the grounds that it seeks or  
26 requires the production of documents that are already in Defendant's possession and/or  
27 otherwise equally available to Defendant. Subject to and without waiving said objections,  
28 Plaintiff responds as follows:

1 Plaintiff will produce all non-privileged, relevant responsive documents or materials in its  
2 possession, custody, and/or control.

3 Dated: December 19, 2023

**McPHERSON LLP**  
Edwin F. McPherson  
Pierre B. Pine

4  
5  
6 By: P B P  
7 **PIERRE B. PINE**  
8 **Attorneys For Plaintiff**  
9 **ONETASTE INCORPORATED**

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**VERIFICATION**

I have read the foregoing **RESPONSES OF PLAINTIFF ONETASTE INCORPORATED TO REQUEST FOR PRODUCTION (SET ONE) OF DEFENDANT AYRIES BLANCK** and know its contents. I am an Officer of OneTaste Incorporated, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on December 19, 2023 at Swellendam, South Africa.

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



---

KEVIN WILLIAMS

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 1900 Avenue of the Stars, 25<sup>th</sup> Floor, Los Angeles, California 90067. My electronic service address is: [rcesana@mcperson-llp.com](mailto:rcesana@mcperson-llp.com)

On December 19, 2023, I served the foregoing document described as **RESPONSES OF PLAINTIFF ONETASTE INCORPORATED TO REQUEST FOR PRODUCTION (SET ONE) OF DEFENDANT AYRIES BLANCK** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**SEE ATTACHED SERVICE LIST**

- BY MAIL AS FOLLOWS:** The envelope was mailed with postage thereon fully prepaid. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after service of deposit for mailing in affidavit.
- BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the offices of the addressee.
- BY ELECTRONIC MAIL:** I caused such documents(s) to be transmitted by electronic mail directly to the person(s) being served and to the name(s) and electronic mail address(es) of the person(s) served as set forth on the service list.
- BY FACSIMILE MACHINE:** The foregoing document was transmitted to the above-named persons by facsimile transmission from (310) 553-9233 before 5:00 p.m. on said date and the transmission was reported as complete and without error.

Executed on December 19, 2023, at Los Angeles, California.

- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

RAFFAELLA CESANA



**SERVICE LIST**

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*Attorneys for Defendant AYRIES BLANCK*

# **EXHIBIT D7**

PIERRE B. PINE  
E-MAIL: [ppine@mcpherson-llp.com](mailto:ppine@mcpherson-llp.com)

May 16, 2024

**VIA E-MAIL**

Julia Peng, Esq.  
REED SMITH LLP  
1221 McKinney Street, Suite 2100  
Houston, TX 77010

**Re: Onetaste Incorporated v. Ayries Blanck**  
**Our File No. 1056-1**

Dear Julia:

This letter is in response to your letter dated May 2, 2024, on behalf of Defendant Ayries Blanck (“Defendant”) and the purported issues raised therein. In that regard, Plaintiff OneTaste Incorporated (“Plaintiff”) responds as follows:

**I. Re OneTaste’s Preservation, Collection, and Review of Documents and Data**

In your letter, you mention that it is your understanding that OneTaste is performing its own collection and review of potentially responsive documents and electronically stored information (“ESI”), and then providing such documents to outside counsel (*i.e.*, our offices) for review and production, and you assert that this is “concerning” because OneTaste is unilaterally determining responsiveness. You further assert that “OneTaste’s productions have been unduly limited” and ask that we “disclose what criteria OneTaste has used to identify and produce responsive materials (e.g., custodians, search terms) and identify who from OneTaste has (1) directed the search for responsive materials and (2) participated in the search for responsive materials.”

First, what you characterize as “concerning” is, as you know, common place litigation practice. In fact, in my 23 years of litigation practice, I cannot recall a single case where production searches were not carried out by the client or in-house counsel for the client, who then turns the documents over to counsel for further review to ascertain relevance and privilege issues, prior to the subsequent production of the documents, which is the case here.

Second, your claim that OneTaste’s productions have been “unduly limited” has no basis in reality. To date, OneTaste has produced over 1500 pages of documents (in comparison to Blanck, who has only produced 621 documents, many of which were completely redacted pages), and, unlike Defendant, Plaintiff has committed to producing more documents. As far as your

request for Defendant to disclose what specific criteria was used to identify and produce responsive materials, you cite to no legal authority whatsoever that requires us to provide such information, as no such requirement exists. The questions you raise are questions that Defendant is welcome to ask during a deposition of OneTaste's person most knowledgeable, but certainly not information we are required to provide in connection with simply responding to Requests for Production. Notably, Defendant has provided no such details of what methods and criteria she has used to conduct her own searches for responsive documents and communications, for which she has provided next to nothing.

However, while Plaintiff is under no obligation to provide such information in response to Requests for Production, in the interests of meeting and conferring to resolve issues, Plaintiff will disclose that its in-house counsel (along with a small team of in-house paralegals), has directed the search for responsive materials and directly participated in the search for responsive materials, which has included conducting numerous key word searches through databases containing e-mails, text messages, and documents, in Plaintiff's possession, custody, and control.

In regards to your assertion that OneTaste has "produced virtually no e-mail communications," this is simply false. Plaintiff has produced 62 e-mails just in response to Defendant's Request for Production No. 1, alone. Furthermore, in regards to your assertion that Plaintiff's production has been "unduly limited," Plaintiff will have additional documents to produce in connection with Request No. 1, and hopes to provide such documents in the next 10-14 days, which we believe will complete Plaintiff's production in connection with Defendant's First Set of Requests.

However, as previously detailed in our objections, and explained by me again during our meet and confer call on April 10, 2024, the biggest cause of delay in completing Plaintiff's responses to Defendant's First Set of Requests has been due to Request No. 1 being extremely overly broad, and as drafted, improperly including all privileged communications between Plaintiff and its counsel for the last 9-years. As you know, this Request broadly seeks "All DOCUMENTS related to Ayries Blanck from August 20, 2015 to present," and includes no reference to any specific subject matter, or any exclusion for privileged communications with counsel. When I asked you and Nicole to provide a more limited scope/subject matter, during our call, I believe all you said was that the request was limited to documents relevant to Plaintiff's claims, which does not provide much guidance or limitations.

As I further explained during our call, the vast majority of the communications related to Defendant during that broad time period (following the settlement agreement), is between Plaintiff and counsel, and thus, privileged. Moreover, as I also explained, during this 9-year time period, there were hundreds, if not thousands of privileged communications between Plaintiff and counsel, and providing a privilege log for each and every such communication would be unduly burdensome and oppressive. Plaintiff will not engage in such an exercise, especially in light of Defendant's failure and refusal to narrow the scope of such request, and thus, for purposes of responding and completing its production, Plaintiff will presume that Defendant is not seeking privileged communications with counsel.

In regards to your assertion that "Plaintiff has produced communications in a format that resemble transcripts, and may be incomplete (*see, e.g.*, ONETASTE\_00809-829)," the communications you identify are text messages, which have been produced in the format of a "text file archive," which is one way that iPhones save backups of conversations. This is the

format that those particular communications are maintained by Plaintiff, and thus, the format that Plaintiff has produced them to Defendant. In the instances where Plaintiff is in possession of screen shots of relevant and responsive text messages, such screen shots have been produced (*see, e.g.*, ONETASTE 000279-280, 308, 312-313, 329, 351-352, 386-393, 826, 880, 972).

As far as your assertion that the communications are somehow “incomplete,” the text communications produced by Plaintiff in text file archive format (*i.e.*, transcripts), thus far, have generally been produced to provide a full and complete single day text exchange surrounding the relevant communications. This has been done to limit the production to *relevant* and responsive communications, which is all Plaintiff is required to produce, but to include enough of the surrounding communications to also include the full context of the conversation. If additional days of the text communications would have been relevant and responsive, Plaintiff would have produced the additional days. As you know, Plaintiff is not obligated to produce irrelevant and non-responsive text conversations that could go back or continue forward for many weeks or months (or longer), which would only serve to make Plaintiff’s production unnecessarily time consuming, burdensome, and voluminous. In fact, Defendant’s own production only included limited text message exchanges, and no doubt left out communications between Defendant and those same third-parties that Defendant or your office deemed to be irrelevant and non-responsive.

That being said, if there is a specific text exchange that Defendant asserts is somehow incomplete because it is missing an earlier or later relevant and responsive communication, necessary to provide proper context, please specifically identify all such communications by Bates numbers, and we will review your requests. To the extent that any such additional communications exist, are in Plaintiff’s possession, custody, or control, and are relevant, it will agree to produce them. Notably, all of the subject communications are between Defendant herself and various third-parties, and are thus, communications she could and should have produced if she truly believes that the copies produced by Plaintiff are somehow incomplete or missing necessary context.

In your letter you also request that Plaintiff “identify and describe what sources of electronically stored information have been preserved, collected, and reviewed thus far in connection with this case—including e-mail (*e.g.*, Gmail, Outlook), messenger applications (*e.g.*, instant message, Teams, Slack, WhatsApp), electronic devices (*e.g.* laptops, hard drives), social media accounts (*e.g.*, LinkedIn, Facebook, Instagram), and databases (*e.g.*, Salesforce, the “OM Hub”).” First, I will note that once again you cite no legal authority that requires or obligates Plaintiff to provide such detailed information in response to Requests for Production, and again seeks information that is more appropriate for a PMK deposition.

Second, and most notably, Defendant, who has produced only a handful of responsive documents, and nearly no e-mails or text messages (even between herself and her sister), has not provided any such details as to what sources of ESI she has preserved, collected, and reviewed in connection with her own responses to Requests for Production (*i.e.*, e-mail accounts, messenger accounts, devices, social media accounts, etc.). For Defendant, who unbelievably claims to have gotten rid of the majority of her relevant and responsive documents and communications, to demand such detailed information from Plaintiff, while failing and refusing to provide any such information herself, is completely ridiculous.

However, in the interests of good faith meeting and conferring, Plaintiff will disclose that as part of its efforts to gather and produce responsive documents, Plaintiff has conducted an extensive search of Gmail accounts of current and former employees, and Plaintiff's former social media accounts. Additionally, as part of Plaintiff's internal investigation following the release of the 2018 Bloomberg article, a number of current and/or former staff members allowed copies to be made of some of the data saved in their electronic devices. However, the voluntary copying of current and/or former staff members' devices was by no means comprehensive, as Plaintiff does not keep or have continued access to its current or former staff members' electronic devices, thus, limiting the available documents and communications to those that were previously shared with Plaintiff, all of which have been searched for relevant and responsive documents and produced. As far as data bases, Plaintiff has conducted searches of the online forums "OM Hub" and "MSE." In fact, Plaintiff has already produced one OM Hub and one MSE post, which were relevant and responsive to Defendant's requests, and will be producing more in its upcoming productions.

Your letter also mentions the "Salesforce" database, which is a customer management software that simply tracks calls to and from customers and potential customers, without providing any information as to why any information from that database would be relevant. There is absolutely no responsive information that would be contained in the Salesforce database that would be in any way relevant to Plaintiff's claims or Defendant's affirmative defenses thereto. If you disagree, please provide an explanation as to what specific relevant and responsive information Defendant believes is contained in the Salesforce database.

## **II. OneTaste's Production and ESI**

As mentioned in your letter, pursuant to Section 2031.280(d), Plaintiff is only required to produce ESI "*in the form or forms in which it is ordinarily maintained or in a form that is reasonably usable.*" While you incorrectly assert that Plaintiff has done neither, as explained below, it is clear that Plaintiff has done both, and has acted in full compliance with Section 2031.280(d).

The bulk of Plaintiff's files of this type are maintained as unreadable binary code. In order to comply with Defendant's production requests, Plaintiff has searched and exported these files as PDFs, which Plaintiff has produced in searchable format. However, contrary to Defendant's assertion, Plaintiff has also, when possible and available, produced a large number of files in their native format (with all meta data intact), including the following documents:

Native Email files produced:

- OneTaste 000180
- OneTaste 000181-182
- OneTaste 000183-184
- OneTaste 000186-187
- OneTaste 000189-190
- OneTaste 000191-192
- OneTaste 000194-195
- OneTaste 000196-197
- OneTaste 000199-200
- OneTaste 000202-203



OneTaste 000205-207  
OneTaste 000208-210  
OneTaste 000211-212  
OneTaste 000213-214  
OneTaste 000215-216

Native .csv files produced:

OneTaste 000179-180  
OneTaste 000831  
OneTaste 000833  
OneTaste 000860

Native Video Clips produced:

OneTaste 000805  
OneTaste 000906

Accordingly, where possible, Plaintiff has produced native format files as they are “ordinarily maintained,” or in cases where such production was not possible, Plaintiff has produced database documents in a PDF form that is fully searchable, and thus, “reasonably usable.” Conversely, it must be noted that Defendant has not produced any documents in their native format (with meta data intact), and has only produced PDF documents that are not even searchable, and thus, not “reasonably usable.” Thus, Plaintiff will continue to produce its ESI and other documents in conformity with Section 2031.280(d), by providing responsive documents in their native format (with meta data intact) where possible, or by producing the documents in a searchable (*i.e.*, reasonably usable) PDF format, when not possible.

In regards to your assertions that some documents have data corruption and processing issues, and/or were produced in partial form. I have reviewed the specific documents mentioned (*e.g.*, ONETASTE 000173, 176, 854), and did not find any data corruption or processing issues. I also did not find that they were in partial form. The first two documents are front pages of Goldman Sachs statements, while the third is a text exchange between Defendant and Maya Gilbert, which was provided to Plaintiff by Ms. Gilbert, and was produced because it was responsive to Defendant’s Requests. Plaintiff will be providing additional portions of Defendant and Ms. Gilbert’s text exchange in response to Defendant’s subsequent Requests that Plaintiff is in the process of responding to.

As far as your assertion that messages are missing attachments and embedded images/emojis, the attachments were produced by Plaintiff in all instances where Plaintiff had a copy to produce, and as far as any images/emojis missing, this is simply a product of the text file archive format which is how Apple produces historic texts and is beyond Plaintiff’s control, unless Defendant is suggesting that Plaintiff should manipulate the data to recreate emojis and/or images, which it is not required to do. Again, given that the majority of these communications are between Defendant and third-parties, she is free to produce these communications herself, if she claims they are incomplete, or she can subpoena them from the third-parties that she was communicating with. Plaintiff is only required to produce them in the format in which it is maintained and available to Plaintiff, which it has done in every instance.

### **III. OneTaste's Responses to Document Requests and Missing Privilege Log Entries**

As far as Plaintiff's objections to Defendant's Requests, Plaintiff does not intend to withdraw any of its objections, which it is entitled to make, even if just to preserve such objections. Moreover, as previously discussed, and as set forth in detail in Plaintiff's responses, there are numerous Requests that are so overly broad as to make it nearly impossible to produce documents and complete production for, without them being narrowed in scope as to subject matter and/or time frame (e.g., Requests Nos. 1, 28, 29, 42 - 65, 67 - 78, 106 - 110). Despite Plaintiff's responses providing specific examples of why these Requests are so overly broad and how unduly burdensome it would be to produce all documents responsive to these Requests (the majority of which are completely irrelevant to any of the claims in this case), and reiterating such issues again during our last meet and confer call, the only guidance you provided during our call to narrow the scope, was that Defendant is only seeking documents relevant to Plaintiff's claims. In that regard, despite Plaintiff's valid objections, Plaintiff has done its best to gather and produce responsive and relevant documents in response to all of these overly broad Requests.

As far as the completion of Plaintiff's responses to Defendant's First and Second Set of Requests for Production, Plaintiff believes it will be able to complete its production to the First Set of Requests in the next 10-14 days, which at this point is down to just completing its response to the overly broad Request No. 1. In regards to completing its production to Defendant's Second Set of Requests for Production, Plaintiff believes it will be able to complete such production in the next 21-30 days.

In regards to Plaintiff's privilege log, Plaintiff does intend to update its log to include additional documents, as well as the video interviews that were characterized in your letter as having been partially disclosed to the government in *United States v. Cherwitz*, 1:23-cr-00146 (E.D.N.Y). However, what your letter failed to mention is that on or about July 27, 2023, Judge Chen denied the U.S. government's motion to compel in connection with such interviews, and ruled that all of the referenced video taped witness interviews are protected by the work product privilege and that Plaintiff was not required to produce them in response to the U.S. government's subpoena, and that any portion of the video interviews that were previously shared with the U.S. government did not constitute a waiver of the work product privilege, pursuant to Federal Rule of Evidence 502. Accordingly, Plaintiff will not, and is not obligated to produce such video taped interviews in this case, as they are clearly protected attorney work product. However, Plaintiff will revise its privilege log to specifically include those items.

Moreover, as previously mentioned, in regards to Plaintiff's responses to Request No. 1, which broadly requests "All DOCUMENTS related to Ayries Blanck from August 20, 2015 to present," during this 9-year time period, there were hundreds, if not thousands of privileged communications between Plaintiff and counsel, and providing a privilege log for each and every such communication would be unduly burdensome and oppressive. Plaintiff will not engage in such an exercise. Notably, Defendant has yet to produce any privilege log whatsoever. Please confirm that Defendant is not withholding any responsive documents based on any privilege, and/or please provide a privilege log for any such documents.

Your letter also mentions documents produced by Plaintiff that contain redactions, and ask that all such redactions either be removed, or that Plaintiff provide a log setting forth the basis for each redaction. Plaintiff's redactions consist of removing private account numbers from

financial statements that were produced, and redactions of some customer names and possibly contact information of unrelated third-parties, to protect their rights of privacy. For instance, in the documents referenced in your letter (e.g., ONETASTE 000468-543, 544-619, 620-695, 696-792), the redactions simply removed the names (and in some cases the e-mail addresses) of customers who purchased or expressed interest in purchasing the product(s) referenced therein. These names have no relevance whatsoever to Plaintiff's claims or Defendant's defense thereto. In fact, the only reason those particular documents were produced at all was out of an abundance of caution given the overly broad nature of Defendant's Requests. However, all of Plaintiff's redactions were made very judiciously to be as limited as possible.

Conversely, Defendant has redacted and partially redacted whole portions and pages of numerous documents/communications, without any explanation whatsoever (including BLANCK 0000049 (partial), 50, 492 (partial), 493-496, 537 (partial), 540 (partial), 541-545, 548 (partial), 549 (partial), 550-553, 558 (partial), 562 (partial), 563-567, 568 (partial), 569 (partial), 570-608, and 610-620). Notably, Defendant has failed to provide any log setting forth the basis for these redactions, as she now demands of Plaintiff. To the extent that Defendant's redacted documents consist of communications, Plaintiff is entitled to know who the redacted communications were between and when such communications took place, and on what basis such communications and/or documents were redacted.

#### **IV. OneTaste's Interrogatory Responses**

In your letter Defendant requests that Plaintiff amend its response to Form Interrogatory No. 12.4, in connection with the video taped interviews, already discussed in the prior section. However, all of the requested information as to the persons/witnesses videotaped, the date(s) such videotaped interviews took place, and the names and contact information of the individual(s) who conducted the interviews, are already provided in response to Form Interrogatory No. 12.3. As previously mentioned, all such videotaped interview constitutes attorney work product, and will not be produced, but will be included in Plaintiff's revised privilege log.

#### **V. OneTaste's Requests for Admission**

Defendant's position that she cannot respond to Plaintiff's entire Second Set of Requests for Admission and admit the "genuineness" of the attached communications, because of the format in which some of the text communications were produced, is completely ridiculous, evasive, and in bad faith.

As previously discussed, the format of some of the text communications attached to the Second Set of RFAs, that you assert are "unreliable," is "text file archive" format, which is how Apple produces historic text messages. There is nothing inherently "unreliable" about this format, and short of producing them in binary code, there is no more reliable format. Moreover, given that all of the attachments to the RFAs consist of communications between Defendant and one or more third-parties, even if Defendant does not want to admit the genuineness of the document, she can certainly review the documents and admit or deny the statements *made by her* therein, and respond to the Requests asking her to admit such statements. If she cannot make an unqualified admission to any of these Requests, for whatever reason, she can explain and provide all the facts related thereto in her responses to the related Form Interrogatory No. 17.1.

Furthermore, there are numerous attachments/exhibits to Plaintiff's Second Set of RFAs that are not in text file archive format, including Exhibits 1 - 9, 12, 15, 23 - 26, 32, 34, 35 (produced by Blanck), 39 - 42, 43 (produced by Blanck), 44 (produced by Blanck), 45, and 46). There is absolutely no reason why Defendant cannot admit or deny the genuineness of all such exhibits/attachments, and also respond to the remaining Requests that do not ask Defendant to admit the genuineness of any documents.

Plaintiff will agree to Defendant's request for a 30-day extension to respond to Plaintiff's Second Set of RFAs and Third Set of Form Rogs, but Plaintiff will not agree to reproduce any of the exhibits or withdraw any of the Requests. Plaintiff had previously offered to withdraw some of the Requests consisting of quoted language from the exhibits themselves, for any exhibits which Defendant agreed in advance to admit its genuineness. However, from reviewing your letter it appears that Defendant does not intend to admit the genuineness of any of the exhibits, thus, making it necessary to ask her to admit all of her own statements made therein.

**VI. Defendant's Failure To Provide Code Compliant Responses to Plaintiff's Requests for Production**

During our meet and confer call on April 10, I identified several categories of documents for which Defendant previously stated she would produce responsive documents, but for which none were ever produced, including, but not limited to: (1) communications between Defendant and Ellen Huet or Bloomberg (Requests Nos. 12 and 24); (2) communications between Defendant and her sister, Autymn Blanck, including the transmission and production of Defendant's own journals that were indisputably provided to Autymn, and subsequently read by her during the Netflix Documentary (Request No. 16); and (3) communications between Defendant and Ravi Agrawal (Request No. 29).

It is our understanding that Defendant is taking the position that none of those documents (and others) currently exist and/or are no longer in her possession, custody, or control. To the extent that is the case, I advised during our call that the aforementioned responses would need to be amended to reflect that Defendant does not actually intend to produce documents in response to those Requests. I also explained that we do not believe that those responses and other similar responses are Code compliant under CCP Section 2031.230, which requires Defendant to "*set forth the name and address of any natural person or organization known or believed by [her] to have possession, custody, or control of that item or category of item.*" Thus, Defendant is required to provide us with the name and address of any such person or organization, including, but not limited to her mobile phone provider and/or e-mail provider during the relevant time period, so that, if necessary, we can subpoena those third-parties directly for the missing documents.

During our call, Nicole stated that you would need 30 days to research the issue and to provide us with amended (presumably Code compliant) responses. It has now been well over 30-days since our meet and confer, and we still have not received any such amended responses. Those amended responses must be provided immediately.

Furthermore, in an e-mail dated April 8, 2024, Nicole stated, as an explanation as to why Defendant purportedly has so few responsive documents, that "A few years ago, Ms. Blanck grew very concerned from OneTaste's constant outreach, and took measures to cut herself off from all ties to OneTaste. She no longer has access to the phone, Gmail, or other accounts that

Julia Peng, Esq.  
May 16, 2024  
Page 9

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connected her to OneTaste.” Nicole also indicated in a subsequent e-mail that these steps were purportedly taken by Defendant *prior* to the filing of this lawsuit. However, this rings false, as two of the documents in Defendant’s production (BLANCK\_0000459 and 460) show that Defendant had access to her Gmail account as recently as November 10, 2022, which was *after* the Complaint in this case was filed on October 7, 2022. Further, her document produced, Bates stamped as Blanck 0000621-622, evidences that she has at least some access to communications dating back to August 2014. Thus, in addition to the information regarding the specific accounts purportedly deleted, we also request that Defendant provide the specific month and year (and date, if possible) when she purportedly deleted these accounts and/or communications.

Very truly yours,



PIERRE B. PINE

PBP/pbp

cc: Edwin F. McPherson, Esq.

# **EXHIBIT D8**

**ONETASTE INCORPORATED v. AYRIES BLANCK**

**Privilege Log Re Documents Withheld From Production**

<b><u>Date</u></b>	<b><u>Type of Document</u></b>	<b><u>Privilege Asserted</u></b>
1/27/17	Engagement Agreement between OneTaste, Inc. and legal counsel, Davis Goldberg & Galper PLLC. Re retention of subcontractor, Trident DMG LLC	Attorney Work Product privilege, and Attorney-Client privilege
6/6/23	Master Services Agreement between Blue Highway Advisory LLC and the Law Offices of Paul E. Pelletier	Attorney Work Product privilege

# **EXHIBIT D9**



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 1:23-cr-00146-DG

UNITED STATES OF AMERICA,

-v.-

RACHEL CHERWITZ, and  
NICOLE DAEDONE

Defendants.

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**DECLARATION OF PAUL PELLETIER**

I, Paul E. Pelletier, declare the following in accordance with 28 U.S.C. §1746:

1. I have represented OneTaste, Inc. (“OneTaste”) since March of 2022 and I submit this declaration in support of the Motion to Quash filed by Nicole Daedone and Rachel Cherwitz and in opposition to the government’s Motion to Compel.
2. Except where expressly stated, I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, could do so competently under oath.
3. I have read the Response to the Motion to Quash and Motion to Compel submitted by the government. As set forth more fully below, the response contains inaccurate characterizations of the cooperative process that

OneTaste and its counsel have been engaged in to produce the materials requested by the government during its investigation.

**Prior Counsel's Cooperation With the Government's Investigation**

4. In March of 2022, I was retained by OneTaste as co-counsel with Nanci Clarence of Clarence, Dyer & Cohen LLP who had represented the company since before the 2018 inception of the government's investigation.
5. Before I was retained, the government had issued a subpoena to the company on February 9, 2021. For the year before I was involved, Ms. Clarence oversaw the response to that subpoena and engaged with the government to ensure OneTaste's compliance and cooperation with the government's investigation.
6. In that period, OneTaste, through counsel, had engaged an outside vendor and set-up a Relativity database to search, identify, and make ready for production materials responsive to the February 9, 2021 subpoena, which requested a broad array of decades-old documents and information. The cost to OneTaste of the Relativity platform ultimately exceeded \$200,000.
7. Beginning on March 26, 2021, OneTaste began producing documents. Before I was retained, OneTaste made three productions: on March 26, 2021; on May 7, 2021; and on May 28, 2021.

8. In this timeframe, Ms. Clarence repeatedly reached out to the government to discuss the overly broad nature of the subpoena and to reach an agreement as to how most efficiently respond to and cooperate with the government's investigation.
9. The government stopped returning calls from OneTaste's counsel in early July 2021. By the time I was retained in March 2022, OneTaste's prior counsel had been attempting for approximately one year to coordinate OneTaste's continued cooperation and document productions.
10. During the that time, OneTaste struggled financially as its ability to generate revenue and carry on its daily business operations were hampered by media accounts that sought to portray OneTaste as a "sex cult"-- reporting that was bolstered by references to the ongoing "*FBI Investigation.*" This financial impact caused OneTaste to drastically reduce staff and expenses, including the need to terminate the costly Relativity platform that was now lying fallow.

**Following My Engagement, OneTaste Fully Complies With All Document Requests As Narrowed By the Government**

**A. The Period Between May 2022 – mid-December 2022**

11. After I was retained, in early May of 2022 I reached out to one of the prosecutors who had been handling the case and left a voice message asking

for a return call. On May 13, 2022, I received a call from two prosecutors assigned to the matter. After introducing myself as representing OneTaste, I requested information regarding the current status of the investigation, conveyed that it was my understanding that the government had not been responsive to outreach by OneTaste's prior counsel for almost a year, and that I had been retained to facilitate whatever voluntary cooperation OneTaste could provide to assist in bringing the matter to the most expeditious resolution possible.

12. During the May 13<sup>th</sup> call, the subject of a response to any extant grand jury subpoena was not raised by the government. Given the period of time that had passed since the issuance of the subpoena, I presumed that the Grand Jury that issued it had expired.

13. Beginning in May, the government and I had multiple conversations where the prosecutors informally requested materials and I coordinated OneTaste's voluntary response. I understood that, to the extent these requests differed from the requests in the Grand Jury Subpoena, OneTaste was responding only to the requests now being made by the government.

14. On May 23, 2022 Nanci Clarence, co-counsel for OneTaste, received an email from the prosecutor which informally requested certain OneTaste

records from January 1, 2015 through the present,<sup>1</sup> and stated: “*Good morning Nanci, It has been some time since we last touched base – I hope you are staying well. We are reaching out because we are hoping you may be able to provide us with the items listed below in connection with your representation of OneTaste.*” The prosecutor suggested that, when responding to the request, company counsel should refer to the definition of OneTaste as contained within “the subpoena served to you in January 2021.”<sup>2</sup> Otherwise, there was no mention of the presumed defunct February 2021 subpoena. This request was followed by eight (8) additional, and similarly informal requests for specific financial information. Copy of this May 23 email attached hereto as Exhibit 1.

15. In an attempt to obtain clarification of these informal requests and the seemingly new and narrower scope of the investigation, Ms. Clarence and I scheduled a Zoom call with the government on May 31, 2022. During that call,<sup>3</sup> we inquired about the scope of the investigation in light of the period of time that had passed and the fact that the government had been non-responsive for almost a year. The government explained that the sustained absence was the result of a number factors, including COVID-related issues.

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<sup>1</sup> This time period was significantly shorter than the time period of the February 2021 subpoena, which sought documents from January 1, 2007 until present.

<sup>2</sup> The subpoena being referred to was first properly served on February 9, 2021.

<sup>3</sup> For Zoom and telephone conversations discussed herein I referred to detailed call notes.

Importantly, the prosecutor confirmed that she understood and was sensitive to the fact that these investigations can have a negative impact on the businesses they are investigating. The prosecutor further stated that the government was looking at the investigation differently, which was why the government had narrowed and tailored its requests. She elucidated that her office was now looking to understand the financial structure of the entities and how they were financed. The prosecutor also confirmed that our interests in an expeditious resolution were “aligned,” and that her office would like to wrap things up and that expeditious responses to these informal requests “would go a long way to that end.” Ms. Clarence made a point of saying that OneTaste had been very cooperative, but that the EDNY had “dropped off the face of the earth.” The prosecutor responded by stating that if OneTaste could provide these documents quickly she hoped she could “close this thing out.” We said we would try to get them the information in a week. Ms. Clarence reaffirmed that it had been a very expensive investigation for OneTaste, a company with limited resources. The prosecutor closed by stating, “we are nearing the end of our requests.” At no time did the prosecution mention that she considered the presumptively defunct subpoena was still valid.

16. On June 6, 2022, OneTaste responded to the government's request by providing the requested capitalization tables, state and federal tax returns and Forms 8879-S. Copy of June 6 email transmitting the documents attached as Exhibit 2.
17. On June 15, 2022, I spoke with the prosecutor who confirmed she had received the documents, had given them a " cursory review," and would be following up with an email requesting additional materials. In the email, the prosecutor specifically referred to the paragraph numbers of the original subpoena to which OneTaste should redirect its attention in our response. Copy of June 15 email attached as Exhibit 3.<sup>4</sup>
18. On June 22, 2022, I joined another Zoom call with the prosecutor. In that call I again emphasized the need to resolve the investigation as quickly as possible given the precarious financial condition of the company brought on by the continued investigation. The prosecutor agreed to continue our open dialogue and requested that we initially focus on providing the "Slack" communications referenced in the final bullet point of her June 6 email.
19. From June 28 through July 25, 2022, OneTaste completed its production of responsive documents to the government's June 15 informal request and I

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<sup>4</sup> In this and subsequent exhibits individuals' names have been redacted to protect their privacy. OneTaste will provide unredacted copies of any exhibit at the Court or the government's request.

sent an email to the prosecutor to confirm same. “Attached is the final response to your informal request of June 15. This information should complete the original document request for the relevant period.” I further requested that we speak after she had a chance to assimilate the information. Copy of July 25 email attached as Exhibit 4.

20. On July 28, 2022, the prosecutor emailed me stating that she believed they were still missing some items and, in addition, made another informal request for more documents and materials related to 40 individuals and 7 courses offered by OneTaste. Copy of July 28 email attached as Exhibit 5.

21. On August 5, 2022, I spoke with the prosecutor and discussed and agreed upon a schedule to provide any additional documents she believed were missing from the original responses and a schedule for providing the documents requested in the second informal request of July 28.

22. From August 15 through September 12, 2022, OneTaste provided most of the materials requested by the government in its July 28, 2022, informal requests. On September 12 I also spoke with the prosecutor by phone confirming that I would send the materials by courier as the files were too large to email, and suggested we have a discussion about the resolution of the investigation. The prosecutor replied that she would be in a position to



discuss a resolution “after we get the documents” and that she wanted to take this “one step at a time.”

23. On September 19, 2022, I emailed the prosecutor the index for the production with respect to the fourth part of the July 28 informal request. In my email I confirmed that I would “be calling you this week regarding the *final request* which we will also produce this week.” Copy of September 19 email attached as Exhibit 6.

24. On September 21, 2022, I spoke with the prosecutor by telephone to confirm that I would be providing the seventh and last production called for in the July 28 informal request.

25. On September 21, 2022, the prosecutor followed up our call with an email confirming we would provide Bates stamp numbers for relevant OneTaste course materials that had been provided in March 26, 2021 and May 7, 2021 in response to the February subpoena. The government also made an *additional* informal request for materials regarding the March 2017 sale of OneTaste and communications with Nicole Daedone regarding same. Copy of September 21 email attached as Exhibit 7.

26. By email dated October 2, 2022, OneTaste provided the government with the final materials completing the July 28 informal request and I informed the prosecutor I would contact her the following week to discuss the

production of the materials pursuant to the additional September 21 informal request. Copy of October 2 email attached as Exhibit 8.

27. On October 19, 2022, I spoke with the prosecutor by phone and suggested it was time for our meeting to discuss a resolution of the investigation. The prosecutor confirmed that she wanted to review the final production and then would get back to me to set up that meeting. She then made an additional informal request for the documents evidencing the payment transactions from OneTaste's new owners to Nicole Daedone when the new owners acquired the company. I informed her that OneTaste did not have possession of those documents but would request that the individual investors share them with OneTaste so that I could, hopefully, accommodate the government's new informal request.

28. On October 24, 2022, I emailed the government the final materials responsive to the September 21 voluntary request. I further referenced five prior occasions where One Taste had voluntarily produced responsive documents. I concluded the email by stating: "Finally, as discussed, Nancy and I look forward to meeting you at your earliest convenience *to discuss your longstanding investigation and to continue our cooperative efforts in the hopes of bringing this matter to an expeditious and appropriate conclusion.*" Copy of October 24 email attached as Exhibit 9.

29. On October 26, 2022, I emailed to the government the materials responsive to the prosecutor's October 19, 2022 informal request. I concluded the email by stating: "Nanci and I [look] forward to timely engagement with your team to discuss the potential resolution of this matter." Copy of October 26 email attached as Exhibit 10.

30. On October 31, 2022, I received an email from the prosecutor with an informal "follow up request" seeking more:

documents that relate to OneTaste individualized events and services referred to as "immersions," "1080 immersions," "scenes," or "experiences"? In particular, we would like to obtain related client lists, intake forms, interview notes, video/audio recordings, scripts, list of participants, and communications (by text, email, slack, or any other service) relating to these individualized experiences.

The prosecutor also asked when in December we would be available to meet in person at the government's offices. Copy of October 31 email attached as Exhibit 11.

31. On November 3, 2022, I responded by email to the prosecutor's October 31 additional informal request by confirming that OneTaste would gather and provide the additional information and that we were thankful for the opportunity to meet with them in December with the anticipation that this matter could be brought to resolution. Copy of November 3 email attached as Exhibit 12.

32. On November 8, 2022, I received an email from the government with yet another informal request for materials, now focusing on the topic of OneTaste's affirmative defamation litigation in the United Kingdom against the BBC regarding multiple categorically false published allegations about OneTaste. The government requested "documents or communications that OneTaste has provided to the BBC or any other individual or party ... in connection with the ongoing defamation lawsuit against the BBC, or any defamation lawsuits contemplated against other news organizations." Copy of November 8 email attached as Exhibit 13.

33. On November 21, 2022, I emailed the prosecutors informing them that I would FedEx OneTaste's response to their informal request of October 31. Copy of November 21 email attached as Exhibit 14.

34. On December 4, 2022, OneTaste produced, by FedEx, the materials responsive to the Government's informal production request of November 8, thus completing all of the multiple voluminous and voluntary informal production requests by the government.

35. At no time during the aforementioned exchanges and dialogue, which were centered around OneTaste's cooperative efforts to expeditiously assist the government in bringing the investigation to a responsible and timely close, did the prosecutors mention that they believed the otherwise presumptively

invalid February 9, 2021, subpoena remained enforceable, nor did they request enforcement of any part thereof.

**B. The Period Between Mid-December to February 2023**

36. On December 13, 2022, Nanci Clarence, Reid Weingarten, Jonathan Baum, and I met with the government, as arranged, to discuss any remaining open issues given that OneTaste had provided all of the materials that the government had requested. We also made a presentation directed primarily at the falsity of statements written in the Bloomberg article and aired in the BBC Broadcast which the government acknowledged formed the basis of the government's investigation. This presentation was in the form of a PowerPoint that included video testimony of first-person witnesses directly addressing the falsity of the pertinent allegations made in the BBC broadcast.

37. On December 14, 2022, by email, the government made another informal request for expansive materials in 11 separate categories including "the full recordings of interviews of all individuals who [OneTaste] interviewed in connection with this investigation." Copy of December 14 email attached as Exhibit 15.<sup>5</sup>

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<sup>5</sup> The government later subpoenaed the recordings in a February 21, 2023 Grand Jury Subpoena ("the February 2023 Supplemental OT Subpoena") and, on March 13, 2023, moved before the Honorable Pamela Chen for an order compelling their production. Case No. 23-MC-715 (PKC). On July 27, 2023, Judge Chen denied the government's

38. On December 20, 2022, OneTaste began voluntarily producing materials pursuant to the government's December 14 informal request. Copy of December 20 email attached as Exhibit 16.

39. Subsequently, by email dated December 20, 2022, the government made several additional requests for text messages of five individuals and financial records of three individuals. Copy of December 20 email attached as Exhibit 17.

40. On January 3, 2023, OneTaste provided to the government, by courier, the complete video tape interviews of the witnesses that were identified in our presentation of December 13, 2022 and requested in the informal request of December 20. By email on that date, I provided an index of the materials and agreed to continue to voluntarily provide responsive documents. I further advised, however, that the remaining interviews that had been conducted by OneTaste attorneys and had not been presented to the government in our presentation of December 13 were privileged/work product and would not be tendered to the government pursuant to the informal request of December 14. Copy of January 3 email attached as Exhibit 18.

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motion, ruling that OneTaste's valid claim of work product privilege had not been overcome by the government's *ex parte, in camera* showing.

41. By email dated January 6, 2023, the government requested a timeline for the anticipated production of some of the materials that had been informally requested. Copy of January 6 email attached as Exhibit 19.
42. On January 11, 2023, OneTaste voluntarily provided, by email, additional responses to the government's informal request of December 14. Copy of January 11 email attached as Exhibit 20.
43. On January 13, 2023, I spoke with two prosecutors by phone to explain the basis of our claim of privilege/work product regarding the videotaped interviews that the government sought in their informal request of December 14. The prosecutors disagreed that the videotaped interviews were protected by the attorney-client/work product privileges, and I offered to send them the relevant Second Circuit case law by email.
44. On January 18, 2023, OneTaste voluntarily produced, by email, responses to the 5<sup>th</sup> category of documents in the December 14 informal request. I also provided the relevant Second Circuit case law regarding privilege that I had previously promised to provide. I also requested that the government act with "responsible urgency," concluding: "Please take this email in the spirit that it is written, to seek engagement and dialogue where we can get you the relevant facts so that you can obtain the truth and bring this matter to closure

before OneTaste collapses under the financial weight of this seemingly perpetual investigation.” Copy of January 18 email attached as Exhibit 21.

45. On January 24, 2023, OneTaste voluntarily produced, by email, materials requested in the December 14 informal request. Copy of January 24 email attached hereto as Exhibit 22.

46. On January 26, 2023, the government, by email, made another informal request for “all fear inventories or related intake documents for OneTaste members or employees.” Copy of January 26 email attached as Exhibit 23.

47. On January 31, 2023, OneTaste, by email, provided further responses, to the government’s December 14 informal request. Copy of January 31 email attached as Exhibit 24.

48. On February 3, 2023, OneTaste, by email, provided further responses, to the government’s December 14 informal request. Copy of February 3 email attached as Exhibit 25.

49. On February 6, 2023, OneTaste, by email, provided further responses, to the government’s December 14 informal request. Copy of February 6 email attached as Exhibit 26.

50. On February 9, 2023, OneTaste, by email, provided further responses, to the government’s December 14 informal request. Copy of February 9 email attached hereto as Exhibit 27.



51. On February 16, 2023, I participated in a conference call with three prosecutors regarding OneTaste's assertion of privilege as to the witness interviews desired by the government. The tone of this conversation was entirely distinct from my prior engagements with the prosecutors on the case. The government, without addressing the adverse Second Circuit case law I previously provided, demanded production of all 70+ videotaped interviews conducted by OneTaste of mostly former OneTaste employees. Moreover, for the very first time in all of our prior extensive conversations regarding the voluntary production of documents the government raised the issue of alleged non-compliance with the defunct February 9, 2021, subpoena. I was surprised by the government's response given OneTaste's fulsome and productive cooperative engagement extending for over two years. I reiterated OneTaste's continued desire for a resolution and the vital economic need for a prompt conclusion to the investigation which the prosecutor had previously expressed sensitivity.

### **C. The February 2023 Subpoenas**

52. On February 21, 2023, I received, by email, two grand jury subpoenas. The first was identical to the defunct subpoena originally issued on February 9,

2021.<sup>6</sup> The re-issuance of the original February 2021 subpoena was puzzling since the government and I had engaged in nearly a year's worth of open dialogue during which it narrowed those requests and to which OneTaste fully and completely responded.

53. The second subpoena issued on February 21, 2023, sought, *inter alia*, production of the 73 video-taped witness interviews that were protected from disclosure as OneTaste refused to voluntarily provide these materials due to their privileged/work product status.

54. On February 29, 2023, I spoke by telephone with the prosecutors with respect to scheduling responses to the outstanding subpoenas. One prosecutor stated: "I am not really worried about a response to the first subpoena right now." We then discussed and agreed upon a thirty-day timetable for responding to the second supplemental subpoena, with the understanding that we would discuss extending that deadline if needed.

55. On March 24, 2023 I spoke by telephone with the prosecutor confirming the production schedule with respect to the second supplemental subpoena.

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<sup>6</sup> In its motion the government casually made the following misleading averment with respect to the reissuance of the initial subpoena: "On February 21, 2023, *out of an abundance of caution* and to avoid any further dispute as to whether the subpoena remained in effect, the government reissued the original defunct subpoena to OneTaste." Gov't Opp. 3 (emphasis added). As the government well knows, however, the initial issuing grand jury had long since expired and the original February 2021 subpoena was in fact null and void.

56. On March 27, 2023, OneTaste sent by thumb drive, as confirmed by email, its initial response to the second supplemental subpoena. Copy of March 27 email attached as Exhibit 28.

57. On March 29, 2023, OneTaste, by email, provided an additional partial response to the second supplemental subpoena. Copy of March 29 email attached as Exhibit 29.

#### **D. Conversations with the Government Post-Indictment**

58. On April 3, 2023, OneTaste sent, by email, responsive documents to the second supplemental subpoena as well as a privilege log. I also noted that documents responsive to this request had already been provided on three (3) prior occasions. Copy of April 3 email attached as Exhibit 30.

59. Unbeknownst to OneTaste, on April 3, 2023, a grand jury returned an indictment against Nicole Daedone and Rachel Cherwitz. As such, the previously issued subpoenas were likely null. Nevertheless, the government continued to seek compliance with respect to each subpoena.

60. By email dated April 12, 2023, the government sought a response to a portion of the supplemental subpoena and made an informal request for additional information. Copy of April 12 email attached as Exhibit 31.

61. On April 13, 2023, I responded to the government's request noting that OneTaste had previously responded to requests #6 and #8 of the

supplemental request and that OneTaste had provided responsive information on six specified prior occasions. Copy of April 13 email attached as Exhibit 32.

62. On April 25, 2023, OneTaste provided, by email, responsive documents to the supplemental subpoena along with a privilege log. I also indicated that I would provide documents responsive to the government's informal request of April 12 before further responding to the additional supplemental subpoena requests. Copy of April 25 email attached as Exhibit 33.

63. On May 2, 2023, the government, by email, made an additional informal request for documents from OneTaste. Copy of May 2 email attached as Exhibit 34.

64. On May 18, 2023, the government, by email, requested the status of production pursuant to their voluntary requests. Copy of May 18 email attached as Exhibit 35.

65. On May 19, 2023, I informed the government that OneTaste had provided the relevant employment information on July 13, August 26 and August 30, 2022, as well as on May 4, 2023. Copy of May 19 email attached as Exhibit 36.

66. On June 6, 2023, the indictment against Daedone and Cherwitz was unsealed.

67. On August 4, 2023 I received an email from the government requesting the status of the items that “OneTaste intends to produce in response to the grand jury subpoena.” Copy of August 4 email attached as Exhibit 37.
68. On August 11, 2023, the government sent to OneTaste yet another subpoena seeking additional documents that appeared to relate directly to the charges in the indictment of Daedone and Cherwitz.
69. On August 28, 2023, I emailed the government confirming that OneTaste has couriered responsive materials to the supplemental subpoena and informed the government that OneTaste had already produced responsive documents in September of 2022 and June of 2023. Copy of August 28 email attached as Exhibit 38.
70. On August 29, 2023, I emailed the government confirming that OneTaste has couriered three additional files responsive materials to the supplemental subpoena. Copy of August 29, 2023 email attached as Exhibit 39.
71. On September 12, 2023, I emailed the government a link to the production of documents responsive to the supplemental subpoena and confirmed that OneTaste was reviewing the final production of documents to be produced with respect to the supplemental subpoena. Copy of the September 12 email attached as Exhibit 40.

72. On September 14, 2023, I emailed the government a privilege log corresponding to the seventh request of the Supplemental Subpoena as well as a link to a handful of additional materials that were responsive. Copy of September 14 email attached as Exhibit 41.
73. On September 22, 2023, I emailed the government a link to the final set of documents responsive to the seventh request of the Supplemental Subpoena. Copy of September 22 email attached as Exhibit 42.
74. On September 29, 2023, I contacted the government by telephone and stated that as it relates to the additional August 11, 2023 subpoena, that it appeared that its dominant purpose was to compel evidence for use in the trial of Ms. Daedone and Ms. Cherwitz. After stating that she believed that OneTaste did not have standing to challenge the subpoena, government counsel agreed to take the issue under advisement and get back to me.
75. On September 29, 2023, I emailed the government additional documents responsive to the supplemental subpoena. Copy of September 29 email attached as Exhibit 43.
76. On October 2, 2023, I emailed the government reminding them that I was awaiting its response to my request that they withdraw the improper portions of the August 11 subpoena. The government responded on that day that they

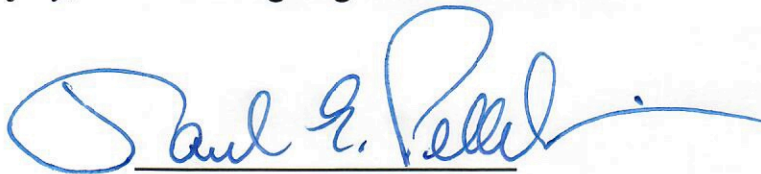
“had not yet had a chance to discuss this” but would get back with me. Copy of October 2 email correspondence attached as Exhibit 44.

77. On October 21, 2023, I emailed the government a link to additional responsive documents to the supplemental subpoena. Copy of October 21 email attached as Exhibit 45.

78. On December 2, 2023, I had a phone conversation with the government in which they insisted on enforcement of the August 11 subpoena and insisted that OneTaste did not have standing to object.

79. Between 2021 and 2023, the government made 200 documents requests to OneTaste. In response, OneTaste made 47 productions, amounting to 120 gigabytes of files, 75,000 documents, and more than 200,000 pages of material. A table laying out these requests and productions is attached as Exhibit 46.

I declare, under penalty of perjury, that the foregoing is true and correct.



Paul E. Pelletier

January 23, 2024.

# EXHIBIT 1

**From:** "Kassner, Gillian (USANYE)" <Gillian.Kassner@usdoj.gov>  
**Date:** May 23, 2022 at 7:24:31 AM PDT  
**To:** Nanci Clarence <nclarence@clarencedyer.com>  
**Cc:** Jonathan Baum <jbaum@clarencedyer.com>, "Lash, Devon (USANYE)" <DEVON.LASH@usdoj.gov>, "Elbert, Lauren (USANYE)" <Lauren.Elbert@usdoj.gov>  
**Subject:** OneTaste

Good morning Nanci,

It has been some time since we last touched base – I hope you are staying well. We are reaching out because we are hoping you may be able to provide us with the items listed below in connection with your representation of OneTaste.

From January 1, 2015 through present:

1. OneTaste's capitalization table, or, if OneTaste does not have one, a full list of all OneTaste investors and fully-executed agreements setting out the terms of their investments.
2. All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit & loss and vendor reports.
3. All records or other documents relative to the above whether or not used in the preparation of a tax return including Vendor Invoices; Forms 1099; Forms 1098; Trust Agreements; Consulting Agreements; Commission Agreements; Insurance Policies; Loan Agreements and Promissory Notes.
4. Copies of OneTaste's federal and state income tax and employment tax returns including amended tax returns whether filed or unfiled.
5. For S-corporations, schedules identifying shareholder's basis in stock and debt at the beginning and end of each tax period including information which identifies any adjustments to shareholder basis.
6. For Partnerships, schedules identifying beginning and ending balances in partner capital account for each tax period including information which identifies any adjustments to capital account balances. Include information which identifies and partnership non-recourse debt.
7. For each tax return prepared and electronically filed, signed copies of:
  - a. Form 8879-PE IRS e-file Signature Authorization for Form 1065;
  - b. Form 8879-S IRS e-file Signature Authorization for Form 1120S;
  - c. Form 8879-C IRS e-file Signature Authorization for Form 1120;
  - d. Form 8879-F IRS e-file Signature Authorization for Form 1041.
8. Copies of Form TD F 90-22.1 or FinCEN Form 114, Report of Foreign Bank and Financial Accounts prepared or filed on behalf of OneTaste.



“OneTaste” as used above is defined in accordance with the subpoena served to you in January 2021 and includes (a) OneTaste Corporation D.B.A. ESP, and any of its predecessors, parents, subsidiaries, affiliates, segments, branches, groups, operations, units, plants, and divisions, both presently existing and those which previously existed, as well as any joint ventures of which OneTaste is a part, including but not limited to OneTaste New York, OneTaste Washington D.C., OneTaste Boston, OneTaste Colorado, OneTaste Austin, OneTaste Bay Area, OneTaste Media LLC, Mirror Clan Inc., Caravan Retreats, Do the Right Thing, Om Free, The OneTaste Foundation, Fill Up America, and The Land and (b) each of OneTaste’s present or former officers, directors, representatives, employees, attorneys, consultants, contractors, agents, acting or purporting to act or appearing to act on behalf of OneTaste, whether or not their actions were authorized by OneTaste or were within the proper scope of their authority.

We are happy to set up a phone call with you to discuss these requests in more detail. I am traveling during the first half of this week, but am available on Thursday (May 26) or next Tuesday (May 31) if there is a time that works for you.

Thank you,


Gillian

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney’s Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

# EXHIBIT 2

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov   
**Subject:** Re: [EXTERNAL] Re: OneTaste Document Request  
**Date:** June 6, 2022 at 5:06 PM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Nanci Clarence nclarence@clarendedyer.com

Received — thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

On Jun 6, 2022, at 7:56 PM, Paul Pelletier <pepelletier3@gmail.com> wrote:

Gillian:

It was good to speak with you last week and we look forward to a continued dialogue to get you the information you need in order that we can soon reach closure in this matter. Attached below is a Document Production Index which includes Tabs for the relevant federal and state tax filings, 1099's and capitalization table regarding One Taste Inc, for the relevant time periods. Following this email will be six separate zip files containing the documents as indexed below. We have tabbed them in a way that should facilitate access to the pertinent documents. We wanted to provide this information to you as expeditiously as possible. To the extent you would like specific back up information, we are happy to discuss so that we can get you such information as quickly as possible. While we do not represent some of the entities from which you have requested documents, we think this production will provide the necessary information that will allow appropriate analysis and review which, we hope, will further cogent discussions regarding any further information you may need. As we stated in our call, it is our desire to promptly provide you access to the information you need to resolve this matter. Looking forward to hearing from you.

Paul & Nanci

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 3

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** RE: [EXTERNAL] Zip File 6

**Date:** June 15, 2022 at 1:56PM

**To:** Paul Pelletier pepelletier3@gmail.com

**Cc:** Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

GK

Hi Paul,

Thank you for speaking with me earlier today, and for providing these materials so quickly. I wanted to follow up with the following additional requests in connection with this investigation:

- Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10):
  - Nicole Daedone
  - [REDACTED]
  - Rachael Cherwitz
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- Rental and lease agreements associated with all prior and current OneTaste locations (Subpoena Request # 9)
- Documents sufficient to identify the ownership, investors and legal representation (if any) of OneTaste entities other than OneTaste Incorporated, including but not limited to
  - The Land
  - One Taste Holdings LLC
  - One Taste Investments LLC
  - OneTaste New York
  - OneTaste Washington D.C.
  - OneTaste Boston
  - OneTaste Colorado
  - OneTaste Austin
  - OneTaste Bay Area
  - OneTaste Media LLC
  - Mirror Clan Inc.
  - Caravan Retreats
  - Do the Right Thing

- Om Free
- The OneTaste Foundation
- Fill Up America
- Executed agreements concerning the sale (including the sale of shares of common stock) of OneTaste and any of its affiliates (Subpoena Request # 13)
- Documents concerning any payments made to Nicole Daedone (Subpoena Request # 11)
- Sales Team records and communications, including relevant slack communications/text messages (Subpoena Requests # 2 and # 3)

We would be happy to discuss these requests in more detail by phone if it would be helpful.

Thank you,

Gillian

# EXHIBIT 4

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to Request/Bullet Point Five-- Email 1 of 2  
**Date:** July 25, 2022 at 2:20 PM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

---

Received – thank you.

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**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Monday, July 25, 2022 4:48 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>  
**Cc:** Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Nanci Clarence <nclarence@clarencedyer.com>  
**Subject:** [EXTERNAL] Response to Request/Bullet Point Five-- Email 1 of 2

Gillian: attached is the final response to your informal request of June 15. Attached hereto is the index to the 14 tabs which are contained in two Zip drives. Zip drive one, attached here, contains tabs 1 through 7. Zip drive two, sent by separate email, contains tabs 8 through 14. This information should complete the original document request for the relevant period. Please let me know if you have any questions. I will circle back with you after you have had a chance to review. Thanks. Pep

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151







**From:** Paul Pelletier pepelletier3@gmail.com   
**Subject:** Response to Bullet Point/Request #4  
**Date:** September 19, 2022 at 4:40 PM  
**To:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com

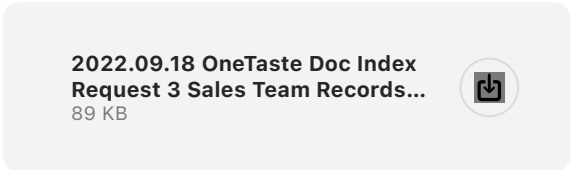
Gillian: attached is the index for the response to request/bullet point #4, i.e., One Taste Sales Records for the relevant period.

As explained, the responsive documents are too voluminous to send vial email so it was places on a thumb drive and sent by FedEx with the following tracking # to the following address:

Carrier: Fedex  
Tracking number: 2781-6364-9832

U.S. Attorney's Office  
Eastern District of New York  
Attn: Anna November (Floor 6)  
271A Cadman Plaza East  
Brooklyn, NY 11201  
[Gillian.Kassner@usdoj.gov](mailto:Gillian.Kassner@usdoj.gov)  
718.254.6224

I will be calling you this week regarding the final request which we will also produce this week. Do you have time to speak on Wednesday? Please let me know if you have any questions after you receive the thumb drive. Pep



Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** RE: [EXTERNAL] Response to Bullet Point/Request #4

**Date:** September 21, 2022 at 9:20 AM

**To:** Paul Pelletier pepelletier3@gmail.com

**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Hi Paul,

Thank you again for speaking earlier. We will look out Bates stamps for the following courses:

- Mastery Courses (2014)
- Mastery Course LA (June 2015)
- Magic School (Spring 2015)
- Magic School (August 2014)

We will also look out for the following materials:

- Nicole Daedone Intensive (Fall 2014)
- Mastery Courses (additional from 2014 and 2015)
- Taboo (October 2015)

In addition, please provide us with the following:


- Agreements associated with March 2017 sale of OneTaste and any payments made to Nicole Daedone in connection with (both before and after) her departure from the company in 2017 (including any sale of OneTaste equity). We would also like any communications or documents you have concerning Nicole Daedone's departure from OneTaste.

Thank you,

Gillian

# EXHIBIT 8



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov   
**Subject:** Re: [EXTERNAL] Response to Bullet Point/Request 5  
**Date:** October 2, 2022 at 7:17 AM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

On Oct 2, 2022, at 9:46 AM, Paul Pelletier <pepelletier3@gmail.com> wrote:

Gillian: Enclosed please find our final response to Bullet Point/Request 5 of your July 29 email for the relevant entities and time periods. For ease of reference there is an index identifying the Tabs which are included in the zip file. As we discussed, I have attempted to identify the Bates-stamp numbers of the relevant documents that were produced previously and are not being re-produced herein. I will contact you next week to discuss the final production requested in your most recent email. Please let me know if you have any questions. Pep

Paul E. Pelletier  
pepelletier3@gmail.com  
202.617.9151

**2022.09.30 Production EDNY 5  
Course records and attendees...**  
6.3 MB



**2022.09.30 OneTaste Doc Index  
Request 5 Course records and...**  
170 KB



**From:** Paul Pelletier pepelletier3@gmail.com   
**Subject:** Response to September 21, 2022 Request  
**Date:** October 24, 2022 at 3:08 PM  
**To:** Gillian Kassner gillian.kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com

Gillian: In response to your September 21, 2022 request for “Agreements associated with March 2017 sale of OneTaste and any payments made to Nicole Daedone in connection with (both before and after) her departure from the company in 2017 (including any sale of OneTaste equity). We would also like any communications or documents you have concerning Nicole Daedone’s departure from OneTaste,” we make the following production of documents.

Per our discussion, below I have attached a zip file and an index of the items responsive to such request. Also, as set forth below, and as discussed, many of the requested materials have already been provided to the government.

#### 1 - Agreements associated with the March 2017 sale

- The main agreement regarding the March 2017 sale was a SPA between seller Nicole Daedone and purchasers [REDACTED] on March 3, 2017. This was **requested on June 15, 2022**, “Executed agreements concerning the sale (including the sale of shares of common stock of OneTaste and any of its affiliates.” It was **produced on July 19, 2022**. The \$12 million purchase price can be found on page 5, Section 2.02.

#### 2 - Payments made to Nicole in connection with the March 2017 sale

- There were no payments made to Nicole by OneTaste in connection with the March 2017 sale. She did not receive a severance agreement or exit package.

- OneTaste has already provided all financial payments made by OneTaste to Nicole in several formats:

- **On May 23, 2022**, EDNY requested:

- OneTaste cap tables,
- All OneTaste bookkeeping and accounting records,
- Copies of OneTaste federal and state income tax returns, and
- Copies of OneTaste tax filing forms.

- **On June 6, 2022 we produced** the cap tables, federal and state income tax returns (including Nicole’s K1 distributions).

- **On June 15, 2022, EDNY requested**, “Documents concerning any payments made to Nicole Daedone”. These were produced on **July 6, 2022**.

- **On July 28, 2022, EDNY requested**, “All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit & loss and vendor reports.” These were **produced on August 24, 2022**.

#### 3 - Documents concerning Nicole’s departure from OneTaste

- Those documents are attached hereto but you should know that to extent this request includes Nicole’s

employment documents, they were **produced on July 13, 2022**, including her letter of resignation dated March 2, 2017 (link) in response to the **June 15, 2022, EDNY request** for “Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for...Nicole Daedone.”

As we also discussed, payments to Nicole related to the sale of One Taste were not made by One Taste and are not records of One Taste. As we discussed, I agreed that I would endeavor to secure such documentation for you to expedite production to you. I believe that I will have the documentation from [REDACTED] shortly ( I am hoping tomorrow). I have not been able to secure the documentation from [REDACTED] attorney but I anticipate that it will be forthcoming, tho not as quickly as the other purchaserr's' documents.

Finally, as discussed, Nancy and I look forward to meeting you at your earliest convenience to discuss your longstaning investigation and to continue our cooperative efforts in the hopes of bringing this matter to an expeditious and appropriate conclusion. Thanks. Pep

2022.10.24 OneTaste Production  
Index.docx



2022.10.22 OneTaste Document  
Production.zip



Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 10

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to September 21 Informal Request  
**Date:** October 26, 2022 at 1:28 PM  
**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com

Received – thank you, Paul.

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Wednesday, October 26, 2022 4:02 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Cc:** Nanci Clarence <nclarence@clarencedyer.com>  
**Subject:** [EXTERNAL] Response to September 21 Informal Request

Gillian: per your informal request of September 21 and my prior email I have endeavored to secure confirmation of payments to Nicole Daedone with respect to her 2017 sale of One Taste. While the attached records are not One Taste records I have attempted to gather them to expedite the bringing of this matter to conclusion. I have not been able to secure copies of the cashier's checks referenced in the Dunham bank statements, but the statements identify the transfers. I have also not yet been able to secure documents related to [REDACTED] financial transaction but am still endeavoring to do so. Attached for your convenience is a tabbed-Index to the zip-file.

Please let me know if you have any questions. Nanci and I like forward to timely engagement with your team to discuss the potential resolution of this matter.

Can you please also confirm receipt of this as I am never sure whether the zip file attachment inhibits receipt. Ty pep

Paul E. Pelletier  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Nanci Clarence

**Date:** October 31, 2022 at 1:38 PM

**To:** Paul Pelletier pepelletier3@gmail.com

**Cc:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

GK

Hi Paul,

Thank you for providing us with the last production. We have one follow-up request: can you please provide documents that relate to OneTaste individualized events and services referred to as “immersions,” “1080 immersions,” “scenes,” or “experiences”? In particular, we would like to obtain related client lists, intake forms, interview notes, video/audio recordings, scripts, list of participants, and communications (by text, email, slack, or any other service) relating to these individualized experiences. Happy to discuss this in more detail if you have any questions.

In addition, would you mind letting us know some dates from mid-November to early December when you might be available for an in-person meeting at our office? We will try to do our best to find a time that works for everyone; the more dates you list, the better the chances are that we can find one that accommodates all of our schedules.

Thank you again,

Gillian

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney’s Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

**From:** Paul Pelletier pepelletier3@gmail.com

**Subject:** Re: Nanci Clarence

**Date:** November 3, 2022 at 10:23 AM

**To:** Gillian Kassner Gillian.Kassner@usdoj.gov

**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Thanks for your email Gillian. We will pull together what you have requested and if I have any questions during the process I will get back with you. Thank you also for the invitation for an in person meeting. I will confer with Nanci but I am thinking early December might be best as I will be traveling overseas immediately after Thanksgiving. We will come up with some dates and revert shortly. Cheers, Pep  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

On Oct 31, 2022, at 4:37 PM, Kassner, Gillian (USANYE) <[Gillian.Kassner@usdoj.gov](mailto:Gillian.Kassner@usdoj.gov)> wrote:

Hi Paul,

Thank you for providing us with the last production. We have one follow-up request: can you please provide documents that relate to OneTaste individualized events and services referred to as "immersions," "1080 immersions," "scenes," or "experiences"? In particular, we would like to obtain related client lists, intake forms, interview notes, video/audio recordings, scripts, list of participants, and communications (by text, email, slack, or any other service) relating to these individualized experiences. Happy to discuss this in more detail if you have any questions.

In addition, would you mind letting us know some dates from mid-November to early December when you might be available for an in-person meeting at our office? We will try to do our best to find a time that works for everyone; the more dates you list, the better the chances are that we can find one that accommodates all of our schedules.

Thank you again,

Gillian

**Gillian Kassner**

Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** RE: [EXTERNAL] Re: Nanci Clarence

**Date:** November 8, 2022 at 7:58 AM

**To:** Paul Pelletier pepelletier3@gmail.com

**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

GK

Hi Paul,

We also request that you provide us with any documents or communications that OneTaste has provided to the BBC or any other individual or party (including former OneTaste members) in connection with the ongoing defamation lawsuit against the BBC, or any defamation lawsuits contemplated against other news organizations.

Thank you,

Gillian



# EXHIBIT 14

**From:** Paul Pelletier pepelletier3@gmail.com  
**Subject:** Re: [EXTERNAL] Nanci Clarence  
**Date:** November 21, 2022 at 8:59 AM  
**To:** Gillian Kassner Gillian.Kassner@usdoj.gov



---

Gillian: Hope you are well. Today I will be sending (by FedEx) the responses to your penultimate request. Do you have time to chat briefly this afternoon to discuss a time to meet in early December? Ty pep  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 15

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Nanci Clarence  
**Date:** December 14, 2022 at 7:26 AM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov



Hi Paul,

Thank you for meeting with us. I'm looping in the rest of the team so everyone is on the same page. Yes, I'm available this afternoon to touch base (starting around 1 PM).

As I mentioned yesterday, we are requesting the production of the following materials:

1. The full recordings of interviews of all individuals who have been interviewed in connection with this investigation.
2. Copies of the full threads of all of the communications referenced during yesterday's presentation.
3. All documents regarding OneTaste's course refund policies, and documents sufficient to show any refunds requested and whether they were granted or denied, and the basis for the grant/denial.
4. Time logs for all OneTaste employees.
5. All rental agreements for OM communal living and commercial spaces, and documents regarding OneTaste's collection of rent paid by its members.
6. Documents sufficient to show OneTaste's full course offerings
7. All text and email communications regarding OneTaste by the following individuals:
  - a. Nicole Daedone
  - b. [REDACTED]
  - c. Rachael Cherwitz
  - d. [REDACTED]
  - e. [REDACTED]
  - f. [REDACTED]
  - g. [REDACTED]
  - h. [REDACTED]
  - i. [REDACTED]
  - j. [REDACTED]
  - k. [REDACTED]
  - l. [REDACTED]
  - m. [REDACTED]
  - n. [REDACTED]
  - o. [REDACTED]
  - p. [REDACTED]
8. All communications (including but not limited to text/email/slack) by any OneTaste member regarding [REDACTED] and/or [REDACTED]
9. All communications (including but not limited to text/email/slack) by any OneTaste member regarding allegations of sexual misconduct or abuse in connection with their participation in OneTaste.
10. A list of OneTaste's outside experts hired and the amounts each expert was paid.
11. All documents regarding OneTaste's reconciliation team.


Hopefully items (1) and (2) should be quick to put together, because it appears that they were used to prepare your presentation yesterday. Beyond those items, one of the top priorities is the production of communications by members of OneTaste's leadership. We have never received any communications by Nicole Daedone or Rachel Cherwitz (except for a very limited collection of text threads), including the communications they exchanged with each other

.....

Thank you,

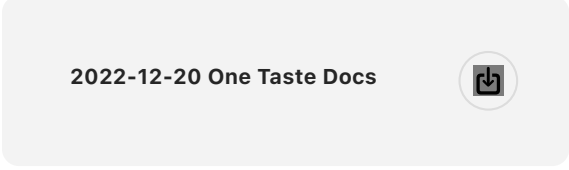
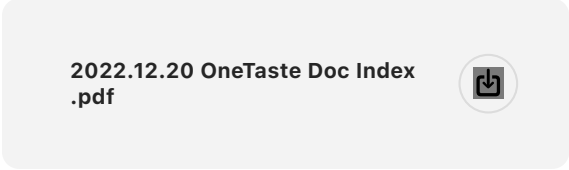
Gillian

# EXHIBIT 16

**From:** Paul Pelletier pepelletier3@gmail.com   
**Subject:** Response to Dec. 14 request  
**Date:** December 20, 2022 at 6:34 PM  
**To:** Gillian Kassner gillian.kassner@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com



Gillian: Pursuant to your request on Dec14, attached please find the documents responsive to #2: Copies of the full threads of all of the communications referenced during our presentation of December 13, 2022. I have also attached a production index for ease of reference. Please let me know if you have any questions. We are working on the production to video witness statements. I hope you are enjoying the holiday season. Pep



Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 17

**From:** "Kassner, Gillian (USANYE)" <[Gillian.Kassner@usdoj.gov](mailto:Gillian.Kassner@usdoj.gov)>  
**Subject:** RE: [EXTERNAL] Response to Dec. 14 request  
**Date:** December 20, 2022 at 10:31:10 PM EST  
**To:** Paul Pelletier <[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)>, "Lash, Devon (USANYE)" <[DEVON.LASH@usdoj.gov](mailto:DEVON.LASH@usdoj.gov)>, "Siegel, Jonathan (USANYE)" <[Jonathan.Siegel@usdoj.gov](mailto:Jonathan.Siegel@usdoj.gov)>, "Elbert, Lauren (USANYE)" <[Lauren.Elbert@usdoj.gov](mailto:Lauren.Elbert@usdoj.gov)>, "November, Anna (USANYE) [Contractor]" <[Anna.November@usdoj.gov](mailto:Anna.November@usdoj.gov)>  
**Cc:** Nanci Clarence <[nclarence@clarencedyer.com](mailto:nclarence@clarencedyer.com)>

Thank you, Paul. Can we please have copies of all text/chat messages that [REDACTED], [REDACTED], [REDACTED] and [REDACTED] exchanged with [REDACTED]?

In addition, can you please provide us with records of all payments made to OneTaste and its leaders and affiliates by [REDACTED], [REDACTED], and [REDACTED]?

Hope you are enjoying the holidays as well.

Gillian

---

**From:** Paul Pelletier <[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)>  
**Sent:** Tuesday, December 20, 2022 9:35 PM  
**To:** Kassner, Gillian (USANYE) <[GKassner@usa.doj.gov](mailto:GKassner@usa.doj.gov)>; Lash, Devon (USANYE) <[DLASH@usa.doj.gov](mailto:DLASH@usa.doj.gov)>; Siegel, Jonathan (USANYE) <[JSiegel@usa.doj.gov](mailto:JSiegel@usa.doj.gov)>; Elbert, Lauren (USANYE) <[LElbert@usa.doj.gov](mailto:LElbert@usa.doj.gov)>; November, Anna (USANYE) [Contractor] <[ANovember@usa.doj.gov](mailto:ANovember@usa.doj.gov)>  
**Cc:** Nanci Clarence <[nclarence@clarencedyer.com](mailto:nclarence@clarencedyer.com)>  
**Subject:** [EXTERNAL] Response to Dec. 14 request

Gillian: Pursuant to your request on Dec14, attached please find the documents responsive to #2: Copies of the full threads of all of the communications referenced during our presentation of December 13, 2022. I have also attached a production index for ease of reference. Please let me know if you have any questions. We are working on the production to video witness statements. I hope you are enjoying the holiday season.  
Pep

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

Mail Attachment.eml

174 KB



# EXHIBIT 18



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to Dec. 14 Request #1  
**Date:** January 3, 2023 at 5:21 PM  
**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov  
**Cc:** November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Received. Thank you, Paul.

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Tuesday, January 3, 2023 8:09 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>  
**Cc:** November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>; Nanci Clarence <nclarence@clarencedyer.com>  
**Subject:** [EXTERNAL] Response to Dec. 14 Request #1

Gillian: please find enclosed an index for the interview files we sent to you today by FedEx. As we discussed, it is our position that these interviews are privileged work product having been executed for the purpose of litigation with the BBC. Thus, pursuant to Rule 502 of the Federal Rules of Evidence, we do not intend to waive the privilege for all purposes but, because we presented portions of these witness interviews to you, in the spirit of cooperation and completeness, we are waiving the work product privilege for these limited purposes. As I previously explained it is our present intention to assert the work product privilege with respect to the remaining interviews conducted in support of the BBC litigation. After you complete your research into the validity of our assertion of the work product privilege, I am happy to discuss with you the potential for additional limited waivers as we have done here. I have pasted below the FedEx Tracking information. Pursuant to your recent requests, we intend to make further productions this week. Please let me know if you have any questions. Thanks for your patience. Pep

This tracking update has been requested by:

Name: Paul Pelletier  
E-mail: [pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)

---

Sent to: [gillian.kassner@usdoj.gov](mailto:gillian.kassner@usdoj.gov)

Paul Pelletier sent U.S Attorney's Office of Eastern District of New York 1 FedEx Standard Overnight® package(s). This shipment is scheduled to be sent on 01/03/2023.

Reference information includes:

Ship date: Jan 3, 2023  
Estimated delivery date: Wed, 1/4/2023 by 4:30 pm  
Service type: FedEx Standard Overnight®  
Packaging type: FedEx® Envelope

Packaging type: FedEx envelope  
Number of pieces: 1  
Weight: 0.50 lb.  
Special handling/Services: Deliver Weekday  
No Signature Required  
Standard transit: 1/4/2023 by 4:30 pm  
Status: Picked up  
Tracking number: 392967013390

Shipper Information	Recipient Information
Fairfax	Brooklyn
VA	NY
US	Paul E. Pelletier
<a href="mailto:pepelletier3@gmail.com">pepelletier3@gmail.com</a>	
202.617.9151	

# EXHIBIT 19



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to Dec. 14 Request #1  
**Date:** January 6, 2023 at 6:42 AM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Thank you. It would also be great if we could have an anticipated timeline for the production of following items, and in particular #1, #2, #5(a) and #5(c), and #6.

Best,

Gillian

--

1. All documents regarding OneTaste’s course refund policies, and documents sufficient to show any refunds requested and whether they were granted or denied, and the basis for the grant/denial.
2. Time logs for all OneTaste employees.
3. All rental agreements for OM communal living and commercial spaces, and documents regarding OneTaste’s collection of rent paid by its members.
4. Documents sufficient to show OneTaste’s full course offerings
5. All text and email communications regarding OneTaste by the following individuals:
  - a. Nicole Daedone
  - b. [REDACTED]
  - c. Rachael Cherwitz
  - d. [REDACTED]
  - e. [REDACTED]
  - f. [REDACTED]
  - g. [REDACTED]
  - h. [REDACTED]
  - i. [REDACTED]
  - j. [REDACTED]
  - k. [REDACTED]
  - l. [REDACTED]
  - m. [REDACTED]
  - n. [REDACTED]
  - o. [REDACTED]
  - p. [REDACTED]
6. All communications (including but not limited to text/email/slack) by any OneTaste member regarding [REDACTED] and/or [REDACTED]
7. All communications (including but not limited to text/email/slack) by any OneTaste member regarding allegations of sexual misconduct or abuse in connection with their participation in OneTaste.
8. A list of OneTaste’s outside experts hired and the amounts each expert was paid.
9. All documents regarding OneTaste’s reconciliation team.



# EXHIBIT 20



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Partial production for Request #3

**Date:** January 11, 2023 at 3:15 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

**Cc:** Nanci Clarence nclarence@clarencedyer.com

Thank you, Paul.

**Gillian Kassner**  
 Assistant United States Attorney  
 United States Attorney's Office  
 Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
 Cell: [347-988-2024](tel:347-988-2024)

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Wednesday, January 11, 2023 6:01:23 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Cc:** Nanci Clarence <nclarence@clarencedyer.com>  
**Subject:** [EXTERNAL] Partial production for Request #3

Gillian:

Below please find a Zip drive and index for the partial response to your December 14 request No. 3. These contain One Taste refund policies. We previously provided your financial statements which showed the book entires and totals for the refunds. We are now gathering the documents for the refund requests and grants/denials of those requests. That will take a bit more time but I wanted to get the policies to you as they were ready. I hope to get the time logs to you by EOW. Please let me know if you have any questions. Pep

## ONETASTE INCORPORATED DOCUMENT PRODUCTION INDEX


January 11, 2023  
 (Responses to informal request of December 14, 2022)

February 2014 Refund Policy	Tab 01
June 2014 Refund Policy	Tab 02
February 2017 Refund Policy	Tab 03
July 2017 Refund Policy	Tab 04

Paul E. Pelletier  
pepelletier3@gmail.com  
202.617.9151

# EXHIBIT 21



**From:** Paul Pelletier pepelletier3@gmail.com   
**Subject:** Response to December 14, 2022 Request #5  
**Date:** January 18, 2023 at 3:14 PM  
**To:** Gillian Kassner gillian.kassner@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com

Gillian:

Below please find an index and a zip file which contains the leases in response to your request #5 of December 14. As to leases extant in 2015, we have previously provided those to you in our response of June 28, 2022. You have further identified in this request that we provide you "documents regarding One Taste collection of rent paid by its members." You should be aware that there are no such documents as One Taste did not collect rents for the residential properties as individual residents were responsible for collecting and paying rental obligations.

I also informed you I would supply the principal case law establishing that the videotaped interviews we conducted in anticipation of litigation of current employees, former employees and witnesses, are plainly imbued with the attorney-client privilege and/or the work product privilege. Our research establishes that these interviews are quintessential privileged and work product material.

For application of the privilege/work product protection to interviews of current and former employees: *See Cical (Beijing) Sci. & Tech. Co. v. Misonix, Inc.*, 331 F.R.D. 218, 226 (E.D.N.Y. 2019)(communications between counsel and current and former employees entitled to protection from disclosure under attorney-client privilege).

For application of the work product doctrine to interviews of any witnesses taken in contemplation of litigation: *See In re Grand Jury Subpoenas Dated Mar. 19, 2002 & Aug. 2, 2002*, 318 F.3d 379, 383-84 (2d Cir. 2002)(In the context of a pending criminal prosecution, the doctrine is even stricter, precluding discovery of "documents made by a defendant's attorney or the attorney's agents except with respect to scientific or medical reports.").

As we further discussed, the Principles of Corporate Prosecution as set forth in §9-28.710 of the Justice Manual provide that a prosecutor may not request privileged or work product material from a cooperating company. Nor is a cooperating entity required to tender such materials to the government. What the manual make clear, however, is that the government is entitled to the facts relevant to the criminal inquiry. As we further discussed, if there are facts of which you are unaware within the multitude of interviews we conducted we have not been so informed. This is principally because, to date, you have been reluctant to share with us any specifics as to the conduct and/or the potential charges you have been investigating since 2018.

Despite this confounding predicament, which in my experience is without precedent, we have continued to cooperate and to voluntarily provide you scores of documents that you requested as it has been our expressed desire to help you get to the truth of whatever you are investigating as expeditiously as possible. Indeed, we have been providing you requested materials since 2018. When you allowed us to make a presentation to you recently, we expressed that we were hamstrung in addressing the specific activity you were investigating. You referenced that we should focus on the allegations as set forth in the BBC documentary and Bloomberg article about One Taste. While we viewed these as sensationalized accounts calculated toward viewership, we focused on the limited allegations of potentially criminal activity. [REDACTED] was the principal person for which we could decipher any allegation that, if true, potentially could amount to a federal crime, though her allegation involved activity that was alleged to have occurred in 2013/2014. Of course, I was surprised when in our recent call you maintained that there may be an allegation you are investigating which was not captured within the BBC and Bloomberg pieces. While that, of course, has no impact on our cooperative non-privileged productions, it shines a spotlight on the difficulty anyone would have in deciphering what facts you might be interested in within the privileged materials. We want to get that factual information to you so that we can expeditiously resolve this matter.

In that vein, you should recall that we recently provided you with 15 witness statements that were used in the BBC litigation. Those witness statements, listed below, not only provide facts relative to the witness' testimony, but include pertinent communications and photos as attachments.

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]
16. [REDACTED]

At this stage, because we feel like we are continuing to box ghosts, absent direct dialogue with you regarding some parameters of your investigation, and in particular the facts unavailable to you that remain at issue, we are hamstrung in bringing forward those relevant facts, especially in face of the proscriptions of the Justice Manual. I hope we can soon have this important dialogue.

You should know that our continued request that the government exercise responsible urgency is grounded in several factors that continue to debilitate One Taste's ability to remain a viable entity. First, as we explained in our presentation, the media continues to use the "FBI investigation" to legitimize their false reporting; this reporting (supported only by the amorphous "FBI investigation") has seriously impeded One Taste from operating as a viable going concern. Second, the relevant allegations, regardless of their legal and factual merit, are unquestionably outside the corporate sphere of responsibility and include activity which is alleged to have occurred 10 or more years ago. Third, when the initial subpoenas were issued in this matter in 2018, we spent an exorbitant amount of money on a Relativity database in an attempt to promptly cooperate and provide you with the material you requested. We were of course frustrated in that for almost two (2) years we could not communicate with or receive responses from your office in order to coordinate the record returns. In early 2022 I engaged with you in an effort to bring this matter to closure so that One Taste could financially survive. You have been very responsive, and we will continue to timely engage with you to complete the additional requests you have made. I fervently hope, however, that we can resolve whatever factual issues remain and that we can soon have conclusory discussions so One Taste can continue its good work. Fairness dictates nothing less.

Solely, to assist you with the process of resolving this investigation expeditiously, and without waiving work product or attorney-client privilege in accordance with Rule 502 of the Federal Rules of Evidence, attached is a list of the witnesses whom we interviewed in anticipation of litigation.

Please take this email in the spirit that it is written, to seek engagement and dialogue where we can get you the relevant facts so that you can obtain the truth and bring this matter to closure before One Taste collapses under the financial weight of this seemingly perpetual investigation. Thanks. Pep

**2022.01.18 OneTaste Production**  
**.zip**  
9 MB



**2023.01.18 OneTaste Production**  
**Index .pdf**  
63 KB



## Privileged - list of interviews

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]
16. [REDACTED]
17. [REDACTED]
18. [REDACTED]
19. [REDACTED]
20. [REDACTED]

- 21. [REDACTED]
- 22. [REDACTED]
- 23. [REDACTED]
- 24. [REDACTED]
- 25. [REDACTED]
- 26. [REDACTED]
- 27. [REDACTED]
- 28. [REDACTED]
- 29. [REDACTED]
- 30. [REDACTED]
- 31. [REDACTED]
- 32. [REDACTED]
- 33. [REDACTED]
- 34. [REDACTED]
- 35. [REDACTED]
- 36. [REDACTED]
- 37. [REDACTED]
- 38. [REDACTED]
- 39. [REDACTED]
- 40. [REDACTED]
- 41. [REDACTED]
- 42. [REDACTED]
- 43. [REDACTED]
- 44. [REDACTED]
- 45. [REDACTED]
- 46. [REDACTED]
- 47. [REDACTED]
- 48. [REDACTED]
- 49. [REDACTED]
- 50. [REDACTED]
- 51. [REDACTED]
- 52. [REDACTED]
- 53. [REDACTED]
- 54. [REDACTED]
- 55. [REDACTED]
- 56. [REDACTED]
- 57. [REDACTED]
- 58. [REDACTED]
- 59. [REDACTED]
- 60. [REDACTED]
- 61. [REDACTED]
- 62. [REDACTED]
- 63. [REDACTED]
- 64. [REDACTED]

Paul E. Pelletier  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 22

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Response to Jan. 19 Request

**Date:** January 24, 2023 at 4:47 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

**Cc:** Nanci Clarence nclarence@clarencedyer.com

GK

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Tuesday, January 24, 2023 9:59:45 AM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Cc:** Nanci Clarence <nclarence@clarencedyer.com>

**Subject:** [EXTERNAL] Response to Jan. 19 Request

Gillian: Attached please find in response to your email of January 19, 2023, the records in our possession of rent payments made to a company doing business as Caravan Retreats. It's our plan to provide time logs this week. Pep

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 23



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to December 14, 2022 Request #5  
**Date:** January 26, 2023 at 7:19 AM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Nanci Clarence nclarence@clarencedyer.com

Hi Paul,

For the documents that you do not believe exist, please confirm that in writing so we have a record of it. I believe the following items from our previous requests are still outstanding:

- Time logs for all OneTaste employees (we discussed that time logs refers to any records kept by OneTaste employees regarding how they spent their time, including but not limited to the example you showed us during our meeting in December for [REDACTED])
- Records of all payments made to OneTaste and its leaders and affiliates by [REDACTED], [REDACTED] and [REDACTED]
- All text, email and slack communications regarding OneTaste by the following individuals.
  - Nicole Daedone
  - [REDACTED]
  - Rachael Cherwitz
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- All communications (including but not limited to text/email/slack) by any OneTaste member regarding [REDACTED] and/or [REDACTED].
  - This should include copies of all text/chat messages that [REDACTED], [REDACTED], [REDACTED] and [REDACTED] exchanged with [REDACTED]. Please confirm that the chains you produced were full and complete.
- All rental agreements for OM communal living and commercial spaces (we saw the Caravan Retreats records – please confirm you have produced everything and there are no additional rental agreements for any residential or commercial spaces, under the names of any individuals or entities affiliated in any way with OneTaste and/or OneTaste’s management).
- All communications (including but not limited to text/email/slack) by any OneTaste member regarding allegations of sexual misconduct or abuse in connection with their participation in OneTaste.
- All communications (including but not limited to text/email/slack) by any OneTaste member regarding Daedone’s departure from the company.
- Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10) (Requested by email June 15, 2022):





# EXHIBIT 24

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Response for Request #4

**Date:** January 31, 2023 at 3:26 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

**Cc:** Nanci Clarence nclarence@clarencedyer.com

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Tuesday, January 31, 2023 6:20:37 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Cc:** Nanci Clarence <nclarence@clarencedyer.com>

**Subject:** [EXTERNAL] Response for Request #4

Gillian:

Attached please find the Time Logs for employee Time Logs as set forth in your December 14 request #4. As we discussed, Tab 1 contains all of the Time Logs pre-2015?. I believe these are, in the main, the type of logs you saw during our presentation. As we also discussed Tab 2 contains a sample of the records system One Taste implemented to record employee time in 2016. The software used was called T-Sheets. We provide you a sample because as I understand, the records are voluminous and they document only time spent but not the activity for which the time was spent, which you have explained is the focus of your interest. Please let me know if you want to discuss further.

I intend to provide you the resent to request #6, the course offerings, by EOD tomorrow. Let me know if you have any questions. Paul

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 25

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Response to Request #6

**Date:** February 3, 2023 at 8:48 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

**Cc:** Nanci Clarence nclarence@clarencedyer.com

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Friday, February 3, 2023 10:52:34 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Cc:** Nanci Clarence <nclarence@clarencedyer.com>

**Subject:** [EXTERNAL] Response to Request #6

Gillian: attached please find an index and our response to Request #6 in your December 14 email. My goal is to provide you our response to Request No. 10, Outside Experts on Monday. Please let me know if you have any questions. Have a great weekend. Pep

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 26

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Response to Request #10 of 12/14 -- 1 of 4 Tab 1  
**Date:** February 6, 2023 at 6:51 PM  
**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov  
**Cc:** Nanci Clarence nclarence@clarencedyer.com

Received; thank you.

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Monday, February 6, 2023 9:49 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Cc:** Nanci Clarence <nclarence@clarencedyer.com>  
**Subject:** [EXTERNAL] Response to Request #10 of 12/14 -- 1 of 4 Tab 1

Gillian:

Please find **attached** Part 1 of 4 emails reflecting the documents in response to Request #10 in your email of December 14, 2023, "**A list of OneTaste's outside experts hired and the amounts each expert was paid.**" Tab 1 is attached hereto.

The contracts in tabs 02-04 have been split up only because of email size restrictions. There is not a contract for every single expert listed, because One Taste only began using these written contracts in late 2016 for our outside experts/guest teachers.

On August 24, 2022 we produced all of our bookkeeping and accounting records in response to your July 28, 2022 request for "All bookkeeping and accounting records prepared or maintained for OneTaste." Any payments to experts are accessible in those those bookkeeping and accounting records.

Please let us know if you have any questions,

Paul E. Pelletier  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 27

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Response to 12/14 Request #11

**Date:** February 9, 2023 at 5:07 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

**Cc:** Nanci Clarence nclarence@clarencedyer.com

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

---

**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Thursday, February 9, 2023 6:15:46 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Lash, Devon (USANYE) <DLASH@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Cc:** Nanci Clarence <nclarence@clarencedyer.com>

**Subject:** [EXTERNAL] Response to 12/14 Request #11

Gillian: Please find attached and a production index and the documents responsive to Request #11 in your December 14 email, i.e., the documents regarding One Taste's Reconciliation Council. Please let us know if you have any questions. Pep

Paul E. Pelletier  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 28

**From:** Paul Pelletier pepelletier3@gmail.com

**Subject:** Re: [EXTERNAL] Motion to Compel, Case 1:23-mc-00715-PKC (Sealed)

**Date:** March 27, 2023 at 4:02 PM

**To:** Gillian Kassner Gillian.Kassner@usdoj.gov


**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov

PP

---

Gillian: We have put together the response to Request # 5 in the subpoena. It is too large to put in an email so we will courier over a thumb drive to you tomorrow morning. We are still on track for responding to Request #8 on Wednesday. That should be able to be emailed as an attachment or zip file. Pep  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 29

**From:** Paul Pelletier pepelletier3@gmail.com 

**Subject:** Response (partial) to Subpoena Item #8

**Date:** March 29, 2023 at 5:17 PM

**To:** Gillian Kassner gillian.kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

PP

Gillian,

Please find attached a Zip drive with our initial response to subpoena item #8. We are categorizing this as a partial response because we recently located some email accounts that had been archived and cold stored offline (for cost saving purposes). Because those accounts, once prepared for cold storage, cannot be readily searched we will need time to determine whether they contain any responsive material. We anticipate getting you any other items that result from such a manual search of those emails as soon as practicable. We wanted, however, to respond promptly with the responsive material that had been located in our original review. Please let me know if you have any questions. Pep

Paul E. Pelletier

2023.03.29 OneTaste EDNY  
Production #8.zip



Paul E. Pelletier  
pepelletier3@gmail.com  
202.617.9151

# EXHIBIT 30



**From:** Paul Pelletier pepelletier3@gmail.com   
**Subject:** 1 of 5 emails  
**Date:** April 3, 2023 at 5:44 PM  
**To:** Gillian Kassner gillian.kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov

Gillian,

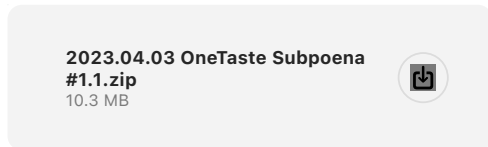
Please find **attached**, and in the emails that follow, our response, in five parts, to Subpoena (2) dated February 21, 2023, item #1 Records of payments made by One Taste by all investors, lenders, partners, acquirers, and owners of any branch of OneTaste, including but not limited to payments by [REDACTED] in 5 separate emails. The documents were voluminous so we have included them in 5 separate Zip files 1.1 through 1.5 which will be provided

We note that several documents responsive to this item have already been voluntarily provided in the following productions:  
 - June 6, 2022: Federal and state tax returns for 2015 onward;  
 - August 24, 2022: All book keeping and accounting records for 2015 onward; and  
 - August 26, 2022: Agreement regarding financial payments to/from certain individuals.

A number of documents were either prepared for or by OneTaste's counsel. Pursuant to section II(D)(1) of the subpoena, we have produced the following privilege log:

Type	Author	Intended Recipients	Other Recipients	Date	Subject Matter	Specific Privilege Asserted	Bates Identification
Memo prepared at the request of counsel	General Counsel	Nanci Clarence, Clarence Dyer Cohen LLP	None	June 2019	Payments Reconciliation	Attorney-Client	PRIV000010
Memo prepared for counsel	Company executives	Jennifer Post, Thompson Coburn LLP	Company executives	September 12, 2018	Potential Cancellation Fee Calculations	Attorney-Client, Work Product	PRIV000011
Memo prepared for counsel	Company executives	Jennifer Post, Thompson Coburn LLP	Company executives	September 12, 2018	Potential Cancellation Fee Calculations	Attorney-Client, Work Product	PRIV000012

Attached is a Zip File labeled 1.1 which is the first of 4 zip files containing the materials responsive to Subpoena Request No. 1. Thank you for your patience. Pep



Paul E. Pelletier  
 Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
 202.617.9151

# EXHIBIT 31

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** OneTaste - Employment Agreements

**Date:** April 12, 2023 at 12:14 PM

**To:** Pelletier Paul pepelletier3@gmail.com

**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

GK

Good afternoon Paul,

Can you please confirm whether you have responded to Item #6 of the February 21, 2023 subpoena (which requests a list of all current OneTaste employees, their titles, and their dates of employment)? I do not believe we have received a response on that yet, unless I am mistaken. In addition, as I believe we discussed on a prior call, can you please produce to us all agreements with all current and former OneTaste employees, contractors and/or volunteers concerning the terms of their responsibilities and compensation? We are happy to make the request by subpoena if needed.

Please let us know when you anticipate being able to produce these materials to us.

Thank you,

Gillian

**Gillian Kassner**

Assistant United States Attorney

United States Attorney's Office

Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Re: OneTaste - Employment Agreements  
**Date:** April 13, 2023 at 12:22 PM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

---

Thank you, Paul.

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Thursday, April 13, 2023 2:52 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>  
**Cc:** Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>  
**Subject:** [EXTERNAL] Re: OneTaste - Employment Agreements

Gillian,

We responded to requests #6 and 10 of the February 21 subpoena in an email dated March 6. Because One Taste doesn't maintain lists of current employees as requested, we attempted to assist in giving you those answers with respect to the list of individuals that you were seeking copies of the video taped interviews in that email. Further, as I also explained in that email, we have also perviously produced lists of OneTaste employees, or documents regarding OneTaste employees, in the following manner:

- On May 28, 2021 in response to the subpoena issued February 9, 2021, item #15 for organizational charts;
- On July 13, 2022 in a voluntary production in response to a request made on June 15, 2022 for employment records of a number of named individuals.
- On August 26, 2022 in a voluntary production in response to a request made on July 28, 2022 for employment records of a number of named individuals.
- On August 30, 2022 in a voluntary production in response to a request made on July 28, 2022 for employment records of a number of named individuals.
- On October 24, 2022 in a voluntary production in response to a request made on September 21, 2022 for communications concerning Nicole's Daedone's departure from OneTaste.
- On January 30, 2023 in a voluntary production in response to a request made on December 14, 2022 for employee time logs.

As it relates to your request for that we voluntarily produce additional information related to this request, namely for "all agreements for OneTaste current/former employees, contractors, volunteers or members," first made on March 24 we intend to supply this information without the need for you to issue a new subpoena. We have, as we hope you can understand, prioritized responding to the subpoena we received on February 21, 2022, over responding to additional voluntary requests. Right now we are working on responding to subpoena item #7, and hope to have our response to you by Monday April 17. After that production is complete, we would happy to re-prioritize this voluntary production ahead of other subpoena responses.

Given the duration of OneTaste's operation, its multiple locations and the fact is that the records this request entails are not centrally organized, we believe we can sort and provide to you these records

request entails are not centrally organized, we believe we can sort and provide to you these records (understood to be a substantial amount of data) by the following Friday April 21.

Please let me know if you have any questions or wish to discuss any of this information further. PEP

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 33

PP

**From:** Paul Pelletier pepelletier3@gmail.com  
**Subject:** Re: [EXTERNAL] Privilege Log for Response to Request No. 7  
**Date:** April 25, 2023 at 1:31 PM  
**To:** Gillian Kassner Gillian.Kassner@usdoj.gov  
**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

Gillian: it looks like they are still too large and getting blocked and returned. At least the first one and second one did. I can either download them onto a thumb drive and courier them to you tomorrow. I you can send me a link and I can try to download them to USA FX. I will do whatever makes best sense for you. Pep  
Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

On Apr 25, 2023, at 4:27 PM, Kassner, Gillian (USANYE) <[Gillian.Kassner@usdoj.gov](mailto:Gillian.Kassner@usdoj.gov)> wrote:

Thank you, Paul.

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**From:** Paul Pelletier <[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)>  
**Sent:** Tuesday, April 25, 2023 4:22 PM  
**To:** Kassner, Gillian (USANYE) <[GKassner@usa.doj.gov](mailto:GKassner@usa.doj.gov)>; Siegel, Jonathan (USANYE) <[JSiegel@usa.doj.gov](mailto:JSiegel@usa.doj.gov)>; Elbert, Lauren (USANYE) <[LElbert@usa.doj.gov](mailto:LElbert@usa.doj.gov)>; November, Anna (USANYE) [Contractor] <[ANovember@usa.doj.gov](mailto:ANovember@usa.doj.gov)>  
**Subject:** [EXTERNAL] Privilege Log for Response to Request No. 7

Gillian,

Please find attached the the privilege log for our response to subpoena Request No. 7 of which we made a partial production last week. This email will be followed by 16 separate emails attaching the responsive documents. I apologize for the large number of emails but I did not want them to bounce back given the volume of materials. We will also be reviewing text messages for further responsive documents to Request No. 7. Because the text data is vast and cumbersome, we expect to begin that review next week when we begin searching for responsive documents (including texts) to Request Nos. 3 and 4. At your request, the next production we are working on is the voluntary production of current and former OneTaste employees, contractors and/or volunteers concerning the terms of their responsibilities and compensation. We hope to have the production to you by the end of the week.

Thank you for the courtesies you have extended in this matter. Please let me know if you have any questions. Pep

Paul E. Pelletier  
[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)  
202.617.9151

# EXHIBIT 34

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** OneTaste

**Date:** May 2, 2023 at 8:48 AM

**To:** Pelletier Paul pepelletier3@gmail.com

**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

GK

Hi Paul,

Can you please send us a list of all attorneys and law firms who have represented OneTaste (presently or previously), and their contact information?

Thank you,

Gillian

**Gillian Kassner**

Assistant United States Attorney

United States Attorney's Office

Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

**EXHIBIT 35**

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] Re: OneTaste - Motion to Quash Meet and Confer  
**Date:** May 18, 2023 at 11:37 AM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

---

Hi Paul,

As you are aware from multiple subpoenas issued to OneTaste, court filings, and our prior discussions, the government is investigating OneTaste and its current and former leaders for potential sex trafficking, forced labor, money laundering, and other offenses. In our subpoenas and court filings, and also in the email below, we have identified a number of specific categories that are relevant to our investigation. These categories of information relate directly to compensation promised to OneTaste employees, compensation earned by OneTaste employees, living and work conditions of OneTaste employees, and OneTaste employees' engagement in sexual acts and romantic relationships, and the voluntariness of their participation in such acts and relationships. We have also identified a number of particular individuals who are relevant to our investigation. We are not sure what you mean by "it" in your email below, but we believe that this information provides you with more than sufficient notice of the subject of our investigation.

With regard to privilege, we cannot agree to an exemption to the normal rules governing a privilege waiver, but we believe we can have a productive discussion about the general substance of the interviews without waiving any privilege or protection. We also do not intend to share with you information about witnesses who we have interviewed or who have testified before the grand jury, and did not understand that to be a prerequisite to your offer to share with us facts witnesses shared with you during the interviews.

Your email to us raises a few questions:

1. You do not state in your email that you are willing to share information that we have requested about each individual's employment status, duties, contract(s) with OneTaste and its affiliated companies, and terms of his/her employment. Do you plan to share that with us? We do not believe it is privileged or covered by any work product protection.
2. You do not state in your email whether you are willing to identify statements the interviewed individuals have made regarding any of the topics listed in our email, or whether you will even tell us whether or not such interviewees discussed the identified topics at all. Do you intend to share that information with us?
3. We understand that [REDACTED] and [REDACTED] reside overseas. Are you able to assist us in contacting them for interviews?

We want to make sure that if we meet and confer, the meeting is productive. If you are not willing to share information that any of the interviewed witnesses disclosed about topics we have identified as directly relevant to our investigation, we cannot see how meeting will help us narrow down or prioritize our requests for the recorded interviews.

Thank you,

Gillian

# EXHIBIT 36

**From:** Paul Pelletier pepelletier3@gmail.com  
**Subject:** Re: [EXTERNAL] OneTaste - Motion to Quash Meet and Confer  
**Date:** May 19, 2023 at 2:31 PM  
**To:** Gillian Kassner Gillian.Kassner@usdoj.gov  
**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

PP

Thanks Gillian. In answer to your three questions, please be advised as follows:

- (1) We provided the employment information you have requested to your office in our discovery responses dated July 13, 2022, August 26, 2022, August 30, 2022 and May 4, 2023. If there is more factual detail relevant to the alleged misconduct under investigation we would be more than happy to discuss and would seek to provide such information during our meeting.
- (2) To be clear, we are prepared to discuss all facts we have learned during our interviews that are relevant to the alleged misconduct which you have outlined generally in your email. We are disappointed that your office persists in maintaining that you will continue to take the position that any information we provide at the meeting would constitute a waiver of the attorney-client privilege. While that may curb a more fulsome discussion, we fully intend to provide you with the facts and information as set forth in the policy requirements of the Justice Manual as you request.
- (3) As always, we are happy to assist in locating [REDACTED] and [REDACTED] so that you may contact them for interviews. I will check with the client over the weekend and hope to provide you contact info early next week. In that vein I wanted to remind you that we previously provided you a copy of the entire video statement of [REDACTED] which contained the snippet we showed you during our presentation. This was provided to you on January 3, 2023. We also note we provided you a written statement of [REDACTED] in our production of December 1, 2022 (Tab 3).

In short, during our meeting, we intend to be entirely forthcoming with the relevant facts we have learned. I would urge that you reconsider your desire to preserve your right to assert that what we discuss at our meeting will constitute a waiver of the attorney-client work-product privilege. As common sense would dictate, such a refusal unnecessarily will put a damper on the free flow of information that we believe would assist you in your investigation. Nevertheless, we fervently believe that this meeting will advance your ability to bring this matter to an expeditious close. Please let me know if the dates I suggested work for you. Have a great weekend. Pep

Paul E. Pelletier  
pepelletier3@gmail.com  
202.617.9151

# EXHIBIT 37

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** RE: [EXTERNAL] OneTaste- Production 31  
**Date:** August 4, 2023 at 7:44 AM  
**To:** Paul Pelletier pepelletier3@gmail.com

GK

**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov,  
Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

---

Hi Paul,

Just circling back on this and the status of the remaining items that OneTaste intends to produce in response to the grand jury subpoena.

Thank you,

Gillian

# EXHIBIT 38

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** Re: [EXTERNAL] Production regarding Subpoena Request #9  
**Date:** August 28, 2023 at 5:07 PM  
**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

GK

Thank you, Paul. We will work to get you access to the materials.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Monday, August 28, 2023 7:48 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Subject:** [EXTERNAL] Production regarding Subpoena Request #9

Gillian,

As promised, we have FedEx'ed you our production in response to request 9 of the February 21, 2023 subpoena to OneTaste.

The tracking number is 783045926532 and it should arrive to your office tomorrow morning.

Three files were too large so we will be sending them tomorrow.

Please note, we have already voluntarily produced the following sales team records:

- Emails of incoming leads (September 19, 2022)
- Sales tracker data (September 19, 2022)
- OneTaste's entire Salesforce database (September 19, 2022)
- OneTaste sales teams's slack thread (July 22, 2023)

Please also note that with respect to the privileged materials that you sent last week, I cannot access them and sent an email to Ms. November regarding same. I have not yet heard back from her. Thanks again.

PEP



# EXHIBIT 39



**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** Re: [EXTERNAL] Re: Production regarding Subpoena Request #9  
**Date:** August 29, 2023 at 10:20 AM  
**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

Received – Thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Tuesday, August 29, 2023 12:56:34 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Subject:** [EXTERNAL] Re: Production regarding Subpoena Request #9

Gillian:

We have just shipped the second usb drive - tracking number 783077373732 containing the three (3) files we had to reformat in order to be small enough to send. You should receive it tomorrow by 5p. Thanks again.

Pep

- > On Aug 28, 2023, at 7:47 PM, Paul Pelletier <pepelletier3@gmail.com> wrote:
- >
- > Gillian,
- >
- > As promised, we have FedEx'ed you our production in response to request 9 of the February 21, 2023 subpoena to OneTaste.
- >
- > The tracking number is 783045926532 and it should arrive to your office tomorrow morning.
- >
- > Three files were too large so we will be sending them tomorrow.
- >
- > Please note, we have already voluntarily produced the following sales team records:
- > -Emails of incoming leads (September 19, 2022)
- > -Sales tracker data (September 19, 2022)
- > -OneTaste's entire Salesforce database (September 19, 2022)
- > -OneTaste sales teams's slack thread (July 22, 2023)
- >
- >
- > Please also note that with respect to the privileged materials that you sent last week, I cannot access them and sent an email to Ms. November regarding same. I have not yet heard back from her. Thanks again.
- >
- > PEP

# EXHIBIT 40

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Response to Subpoena Request #7

**Date:** September 13, 2023 at 5:34 AM

**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

GK

Received - thank you.

**Gillian Kassner**

Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Tuesday, September 12, 2023 11:41:32 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Subject:** [EXTERNAL] Response to Subpoena Request #7

Gillian,

As discussed, please see [linked](#) a folder of the next portion of OneTaste's response to request #7 of the February 21, 2023 subpoena. I will send the privilege log that accompanies this production tomorrow.

As you know, OneTaste has already made two productions in response to this request, on April 19 and April 26 of this year.


Given the volume of records that we are still reviewing for privilege, this production contains only the texts that are responsive to the request. We are aiming to get a final production to of emails responsive to this request by the end of next week.

Please let me know if you have any questions,

Pep

Link also [REDACTED]

# EXHIBIT 41

**From:** Paul Pelletier pepelletier3@gmail.com 

**Subject:** Privilege Log for Response to Request #7

**Date:** September 14, 2023 at 11:16 AM

**To:** Gillian Kassner gillian.kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

PP

Gillian,

Please find **attached** the privilege log that accompanies our most recent production of materials responsive to request #7 of the February 21, 2023 subpoena.

Please find [linked](#) a folder with a handful of additional materials that are responsive, where privileged communications have been redacted, as well as a handful which we determined were not privileged.

Please let me know if you have any questions,

Pep

**2023.09.14 Privilege log.pdf**

58 KB



# EXHIBIT 42

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov  
**Subject:** Re: [EXTERNAL] Response to Request #7 2/23/23 Subpoena  
**Date:** September 22, 2023 at 8:26 PM  
**To:** Paul Pelletier pepelletier3@gmail.com  
**Cc:** Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

Received - thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)  
Cell: [347-988-2024](tel:347-988-2024)

---

**From:** Paul Pelletier <pepelletier3@gmail.com>  
**Sent:** Friday, September 22, 2023 11:23:31 PM  
**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>  
**Cc:** Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>  
**Subject:** [EXTERNAL] Response to Request #7 2/23/23 Subpoena

Gillian,

Please find [linked](#) our final production of documents responsive to the seventh request from the February 21, 2023 subpoena. The link will be active tomorrow morning February 23.

Please also find attached the associated privilege log with this production.

Please let me know if you have any question,

PEP

# EXHIBIT 43

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Production re: request #4

**Date:** September 29, 2023 at 9:16 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

GK

Received - thank you.

## Gillian Kassner

Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

---

**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Friday, September 29, 2023 10:04:46 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Subject:** [EXTERNAL] Production re: request #4

Gillian,

Please find [linked](#) OneTaste's response to request 4 of the February 21, 2023 subpoena. The link will be live by midnight ET today.

Please find **attached** the accompanying privilege log.

Stay dry. Cheers

Pep

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] Production re: request #4

**Date:** October 2, 2023 at 8:35 AM

**To:** Paul Pelletier pepelletier3@gmail.com

**Cc:** Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

GK

---

Thanks, Paul. We have not yet had a chance to discuss this but will get back to you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Monday, October 2, 2023 10:09:02 AM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>

**Subject:** Re: [EXTERNAL] Production re: request #4

Gillian: I know you are in trial today, good luck. This is just a reminder to let me know at your earliest convenience, as we discussed on Friday, whether you will agree to withdraw Part 1 of the August 11, 2023 subpoena. Thanks for your prompt attention to this matter. Pep

# EXHIBIT 45

GK

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] 3rd Request/Privilege Log

**Date:** October 21, 2023 at 2:30 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

Received — thank you.

**Gillian Kassner**  
Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

Tel: [718-254-6224](tel:718-254-6224)

Cell: [347-988-2024](tel:347-988-2024)

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Saturday, October 21, 2023 4:35:32 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Subject:** [EXTERNAL] 3rd Request/Privilege Log

Dear Gillian,

Please find [linked](#) OneTaste's production of email communications in response to the third request of the February 21, 2023 subpoena, and attached the corresponding privilege log. OneTaste will make a follow up production next week with the remaining responsive text communications.

This request in the subpoena refers to "OneTaste members." "OneTaste members" is not defined in this or any other subpoena issued to the company.

I note that in the indictment of Nicole Daedone and Rachel Cherwitz unsealed on June 6, 2023, the government stated that "Individuals who associated themselves with OneTaste, either as employees, or as frequent participants in OneTaste courses and events, identified themselves as "members" of OneTaste."

Over 35,000 people attended in person events offered by OneTaste or licensees of OneTaste authorized to use the OneTaste name and offer courses developed by the company. It is not clear which of these individuals the government would consider to be "OneTaste members" or what level of participation the government would consider frequent.

OneTaste Inc is also not aware of people describing themselves as "OneTaste Members," other than in the following two circumstances, which do not appear to be what the government is referring to:

(1) From 2015 to 2018 OneTaste offered a one-year program called Membership. Those who participated in this specific program were called "OneTaste Members".

(2) In 2008, OneTaste offered a membership program in which people paid \$100/month to be a "OneTaste member", and received discounts on course and members-only events and workshops.

We did not think you desired to limit your request to that narrow definition of a Onee Taste Member, so In responding to this request, OneTaste has attempted to locate all communications in the company's possession "regarding [REDACTED] and/or [REDACTED]."

If you have any questions please let me know, Pep

# EXHIBIT 46

## Voluntary and subpoena requests made to OneTaste

Since 2021 AUSAs from the Eastern District of New York have made 19 rounds of requests to OneTaste, totaling 199 individual questions, which OneTaste has responded to in 48 productions to date. There have been three subpoenas to OneTaste, issued on February 9, 2021, February 22, 2023 and August 28, 2023.

Note: The number to the left of the date in the 'Response' column corresponds with the number of the request in the 'Request' column.

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
Round - 01  30 new requests	SUPOENA // Feb 9, 2021  <u>Time period: Jan 1, 2007 until present</u>	<p>1. Documents concerning the teachings and practices of the Company, including the following:</p> <p>a. Complete Modules concerning Taboo, Magic School, The Mastery Course, and Nicole Daedone Intensives (or NDI).</p> <p>b. Materials, practices, and procedures issued by and/or in effect at the Company that mention rape, sexual assault, and/or the victimhood of women, including but not limited to Forums by any of the following individuals: Nicole Daedone, Rachael Cherwitz, [REDACTED], [REDACTED], [REDACTED].</p> <p>c. Documents depicting current or former members, clients, volunteers, affiliates or employees of the Company in which individuals' breasts and/or public areas are exposed, and records sufficient to show of how such materials were obtained and stored, and the source of such materials.</p> <p>d. Documents depicting or discussing piercing, branding, surgical procedures, and/or other forms of physical modification performed on current or former members, clients, volunteers, affiliates, or employees of the Company, and records sufficient to show how such materials were obtained and stored, and the source of such materials.</p> <p>e. Documents depicting rituals and ceremonies engaged in by current or former members, clients, volunteers, affiliates, and/or employees of the Company, including but not limited to documents depicting priests</p>	<p>3 responses</p> <p>1a – March 26, 2021</p> <p>1a – May 7, 2021</p> <p>15 – May 28, 2021</p>



REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>and priestesses and documents referring to orgasm and/or Nicole Daedone as a deity, and documents instructing individuals to engage in sexual conduct as a service to the Company.</p> <p>f. Documents containing references by Nicole Daedone and/or ██████████ ██████████ to the assaults of one or more individuals.</p> <p>g. Documents directing current or former members, clients, volunteers, affiliates or employees of the Company to engage in sexual activity and/or any other physical contact with one or more other individuals.</p> <p>h. Documents referencing sexual activity among current or former members, clients, prospective clients, volunteers, affiliates or employees of the Company, including documents containing references to “Make Out,” “Gender Balancing,” “Sex Vacation,” “Aversion Therapy” and/or “Aversion Practice.”</p> <p>i. Documents containing references to the concept of consent as it relates to sexual activity.</p> <p>j. Documents referencing the arrangement of marriages among current or former members, clients, prospective clients, volunteers, affiliates or employees of the Company.</p> <p>2. Documents concerning the Company’s recruitment efforts, including but not limited to the following:</p> <p>a. Documents concerning the Company’s effort to recruit new members, clients, or other affiliates through rehabilitation programs; homeless shelters and halfway houses; and adult dating applications and websites.</p> <p>b. Documents concerning agreements or arrangements written or otherwise between the Company and other entities, to include but not limited to ██████████ ██████████, relating to the referral of potential clients, and records of any financial compensation rendered pursuant to such agreements or arrangements.</p>	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>3. Documents concerning any concerns, alerts and/or inquiries submitted or raised by current or former members, clients, volunteers, affiliates, and/or employees of the Company regarding the Company's practices and procedures, and the Company's response(s), if any, to such concerns, alerts and/or inquiries.</p> <p>4. Documents concerning any concerns, alerts and/or inquiries submitted or raised by members of the public regarding the Company's practices and procedures, and the Company's response(s), if any, to such concerns, alerts and/or inquiries.</p> <p>5. Documents concerning any analysis by forensic psychiatrists or psychologists of current or former members, clients, volunteers, affiliates, and/or employees of the Company concerning such persons' experiences at the Company and/or the Company's practices and procedures, including but not limited to communications and invoices relating to such analysis.</p> <p>6. Documents concerning any communications by current or former members, clients, volunteers, affiliates, and/or employees of the Company with law enforcement agents and investigators.</p> <p>7. Documents concerning the Company's ethical review of its practices and procedures, including but not limited to documents relating to "Ethical Breaches" and an "Ethical Review," and an "Ethics Committee," and documents sufficient to identify the members and positions of individuals on or affiliated with the "Ethics Committee."</p> <p>8. Documents concerning the Company's efforts to obtain green cards, visas, or other immigration benefits for current or former members, clients, volunteers, affiliates, and/or employees of the Company.</p>	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>9. Documents sufficient to identify the addresses of any commercial and residential locations affiliated with the Company, including any rental agreements for such locations, any codes of conduct in effect at such locations, and records of payment by tenants of such locations.</p> <p>10. Documents concerning the Company’s compensation practices, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>a. Documents sufficient to identify the amount of commissions and/or wages earned by the Company’s employees, volunteers, and/or independent contractors affiliated with the Company.</li> <li>b. Documents sufficient to identify the payment schedule of commissions and/or wages earned by the Company’s employees and/or independent contractors affiliated with the Company.</li> <li>c. Document concerning any withholding or delay of compensation to the Company’s employees, volunteers, and/or independent contractors affiliated with the Company.</li> <li>d. Documents concerning loans issued by the Company to the Company’s employees, volunteers, and/or independent contractors affiliated with the Company.</li> </ul> <p>11. Documents concerning payments of any kind (including but not limited to loan and royalty payments) made to or from Nicole Daedone and [REDACTED], including any relevant agreements concerning such payments.</p> <p>12. Documents concerning any and all 501(c)3 or other charitable entities established on behest of Nicole Daedone, Rachael Cherwitz, [REDACTED], [REDACTED], to include but not limited to Fill up America, OM Free and The One Taste Foundation.</p>	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>13. Documents concerning any offers, contracts, agreements, or arrangements relating to the sale of the Company and/or any of its affiliates, including but not limited to related records of payment.</p> <p>14. Documents concerning the Company's document retention policies and procedures.</p> <p>15. Organizational charts for the Company including, but not limited to:</p> <p>a. Documents sufficient to identify all current and former employees of OneTaste.</p> <p>b. Documents sufficient to identify the senior management and executive officers of the Company, including reporting chains for all business lines, sales, marketing and compliance functions from January 1, 2007 to the present.</p> <p>c. Documents sufficient to identify the role(s) and title(s) of Nicole Daedone and ██████████ in the Company.</p>	
<p>Round - 02</p> <p>8 new requests</p>	<p>VOLUNTARY REQUEST // May 23, 2022</p> <p><u>Time Period:</u> <u>Jan 1, 2015 to present</u></p>	<p>1. OneTaste's capitalization table, or, if OneTaste does not have one, a full list of all OneTaste investors and fully-executed agreements setting out the terms of their investments.</p> <p>2. All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit &amp; loss and vendor reports.</p> <p>3. All records or other documents relative to the above whether or not used in the preparation of a tax return including Vendor Invoices; Forms 1099; Forms 1098; Trust Agreements; Consulting Agreements; Commission Agreements; Insurance Policies; Loan Agreements and Promissory Notes.</p>	<p>4 responses</p> <p>3, 4, 5, 7 – June 6, 2022</p> <p>1 – Aug 25, 2022</p> <p>4 – Aug 25, 2022</p> <p>5 – Aug 25, 2022</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>4. Copies of OneTaste’s federal and state income tax and employment tax returns including amended tax returns whether filed or unfiled.</p> <p>5. For S-corporations, schedules identifying shareholder’s basis in stock and debt at the beginning and end of each tax period including information which identifies any adjustments to shareholder basis.</p> <p>6. For Partnerships, schedules identifying beginning and ending balances in partner capital account for each tax period including information which identifies any adjustments to capital account balances. Include information which identifies and partnership non-recourse debt.</p> <p>7. For each tax return prepared and electronically filed, signed copies of:  Form 8879-PE IRS e-file Signature Authorization for Form 1065;  Form 8879-S IRS e-file Signature Authorization for Form 1120S;  Form 8879-C IRS e-file Signature Authorization for Form 1120;  Form 8879-F IRS e-file Signature Authorization for Form 1041.</p> <p>8. Copies of Form TD F 90-22.1 or FinCEN Form 114, Report of Foreign Bank and Financial Accounts prepared or filed on behalf of OneTaste.</p>	
Round - 03  56 new requests	VOLUNTARY REQUEST // June 15, 2022	1. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10): <ul style="list-style-type: none"> <li>i. Nicole Daedone</li> <li>ii. [REDACTED]</li> </ul>	5 responses  2 – June 28, 2022  3 – June 30, 2022

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<ul style="list-style-type: none"> <li>iii. Rachael Cherwitz</li> <li>iv. [REDACTED]</li> <li>v. [REDACTED]</li> <li>vi. [REDACTED]</li> <li>vii. [REDACTED]</li> <li>viii. [REDACTED]</li> <li>ix. [REDACTED]</li> <li>x. [REDACTED]</li> <li>xi. [REDACTED]</li> <li>xii. [REDACTED]</li> <li>xiii. [REDACTED]</li> <li>xiv. [REDACTED]</li> <li>xv. [REDACTED]</li> <li>xvi. [REDACTED]</li> </ul> <p>2. Rental and lease agreements associated with all prior and current OneTaste locations (Subpoena Request # 9)</p> <p>3. Documents sufficient to identify the ownership, investors and legal representation (if any) of OneTaste entities other than OneTaste Incorporated, including but not limited to</p> <ul style="list-style-type: none"> <li>i. The Land</li> <li>ii. One Taste Holdings LLC</li> <li>iii. One Taste Investments LLC</li> <li>iv. OneTaste New York</li> <li>v. OneTaste Washington D.C.</li> <li>vi. OneTaste Boston</li> <li>vii. OneTaste Colorado</li> <li>viii. OneTaste Austin</li> <li>ix. OneTaste Bay Area</li> <li>x. OneTaste Media LLC</li> <li>xi. Mirror Clan Inc.</li> </ul>	<p>1 – July 13, 2022</p> <p>4 – July 19, 2022</p> <p>6 – July 22, 2022</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<ul style="list-style-type: none"> <li>xii. Caravan Retreats</li> <li>xiii. Do the Right Thing</li> <li>xiv. Om Free</li> <li>xv. The OneTaste Foundation</li> <li>xvi. Fill Up America</li> </ul> <p>4. Executed agreements concerning the sale (including the sale of shares of common stock) of OneTaste and any of its affiliates (Subpoena Request # 13)</p> <p>5. Documents concerning any payments made to Nicole Daedone (Subpoena Request # 11)</p> <p>6. Sales Team records and communications, including relevant slack communications/text messages (Subpoena Requests # 2 and # 3)</p>	
<p>Round - 04</p> <p>47 new requests</p>	<p>VOLUNTARY REQUEST // July 28, 2022</p>	<p>1. All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit &amp; loss and vendor reports. (Requested by email 5/24/2022)</p> <p>2. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10) (Requested by email June 15, 2022):</p> <ul style="list-style-type: none"> <li>i. [REDACTED]</li> <li>ii. [REDACTED]</li> <li>iii. [REDACTED]</li> <li>iv. [REDACTED]</li> <li>v. [REDACTED]</li> </ul>	<p>6 responses</p> <p>1 – Aug 24, 2022</p> <p>2 – Aug 25, 2022</p> <p>3 – Aug 25, 2022</p> <p>5 – Aug 30, 2022</p> <p>4 – Sept 19, 2022</p> <p>6 – Oct 2, 2022</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>vi. [REDACTED]</p> <p>vii. [REDACTED]</p> <p>viii. [REDACTED]</p> <p>ix. [REDACTED]</p> <p>3. In addition, can you please confirm that you do not have any additional documents for Nicole Daedone, Rachel Cherwitz, [REDACTED] [REDACTED] responsive to this request? I noticed there are very few records, and no records of payments made to/from these individuals.</p> <p>4. Sales Team records in addition to the slack communications provided (Subpoena Requests # 2 and # 3) (Requested by email June 15, 2022)</p> <p>In addition, can you please provide the following additional materials:</p> <p>5. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (happy to provide dates of birth if helpful):</p> <p>i. [REDACTED]</p> <p>ii. [REDACTED]</p> <p>iii. [REDACTED]</p> <p>iv. [REDACTED]</p> <p>v. [REDACTED]</p> <p>vi. [REDACTED]</p> <p>vii. [REDACTED]</p> <p>viii. [REDACTED]</p> <p>ix. [REDACTED]</p> <p>x. [REDACTED]</p> <p>xi. [REDACTED]</p>	



REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		xii. [REDACTED] xiii. [REDACTED] xiv. [REDACTED] xv. [REDACTED] xvi. [REDACTED] xvii. [REDACTED] xviii. [REDACTED] xix. [REDACTED] xx. [REDACTED] xxi. [REDACTED] xxii. [REDACTED] xxiii. [REDACTED] xxiv. [REDACTED] xxv. [REDACTED] xxvi. [REDACTED] xxvii. [REDACTED] xxviii. [REDACTED] xxix. [REDACTED] xxx. [REDACTED] xxxi. [REDACTED] xxxii. [REDACTED] xxxiii. [REDACTED] xxxiv. [REDACTED] xxxv. [REDACTED] xxxvi. [REDACTED] xxxvii. [REDACTED] xxxviii. [REDACTED] xxxix. [REDACTED] xl. [REDACTED]	
		6. Records, course materials, and attendee or student lists for the following courses:	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<ul style="list-style-type: none"> <li>i. Nicole Daedone Intensive (Fall 2014)</li> <li>ii. Mastery Courses (2014)</li> <li>iii. Mastery Courses NYC (2013 – 2016)</li> <li>iv. Mastery Course LA (June 2015)</li> <li>v. Magic School (Spring 2015)</li> <li>vi. Magic School (August 2014)</li> <li>vii. Taboo (October 2015)</li> </ul>	
Round - 05  2 new requests	VOLUNTARY REQUEST // Sept 21, 2022	<p>...In addition, please provide us with the following:</p> <ol style="list-style-type: none"> <li>1. Agreements associated with March 2017 sale of OneTaste and any payments made to Nicole Daedone in connection with (both before and after) her departure from the company in 2017 (including any sale of OneTaste equity).</li> <li>2. We would also like any communications or documents you have concerning Nicole Daedone's departure from OneTaste.</li> </ol>	<p>2 responses</p> <p>2 – Oct 24, 2022</p> <p>1 – Oct 26, 2022</p>
Round - 06  1 new request	VOLUNTARY REQUEST // Oct 31, 2022	<ol style="list-style-type: none"> <li>1. We have one follow-up request: can you please provide documents that relate to OneTaste individualized events and services referred to as "immersions," "1080 immersions," "scenes," or "experiences"? In particular, we would like to obtain related client lists, intake forms, interview notes, video/audio recordings, scripts, list of participants, and communications (by text, email, slack, or any other service) relating to these individualized experiences. Happy to discuss this in more detail if you have any question.</li> </ol>	<p>1 response</p> <p>1 – Nov 21, 2022</p>
Round - 07  1 new request	VOLUNTARY REQUEST // Nov 8, 2022	<ol style="list-style-type: none"> <li>1. We also request that you provide us with any documents or communications that OneTaste has provided to the BBC or any other individual or party (including former OneTaste members) in connection with the ongoing defamation lawsuit against the BBC, or</li> </ol>	<p>1 response</p> <p>1 – Dec 1, 2022</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		any defamation lawsuits contemplated against other news organizations.	
Round - 08  26 new requests	VOLUNTARY REQUEST // Dec 14, 2022	<p>As I mentioned yesterday, we are requesting the production of the following materials:</p> <ol style="list-style-type: none"> <li>1. The full recordings of interviews of all individuals who have been interviewed in connection with this investigation.</li> <li>2. Copies of the full threads of all of the communications referenced during yesterday's presentation.</li> <li>3. All documents regarding OneTaste's course refund policies, and documents sufficient to show any refunds requested and whether they were granted or denied, and the basis for the grant/denial.</li> <li>4. Time logs for all OneTaste employees.</li> <li>5. All rental agreements for OM communal living and commercial spaces, and documents regarding OneTaste's collection of rent paid by its members.</li> <li>6. Documents sufficient to show OneTaste's full course offerings</li> <li>7. All text and email communications regarding OneTaste by the following individuals: <ol style="list-style-type: none"> <li>a. Nicole Daedone</li> <li>b. [REDACTED]</li> <li>c. Rachael Cherwitz</li> <li>d. [REDACTED]</li> <li>e. [REDACTED]</li> <li>f. [REDACTED]</li> </ol> </li> </ol>	<p>10 responses</p> <p>2 – Dec 20, 2022</p> <p>1 – Jan3, 2023</p> <p>3 – Jan 11, 2023</p> <p>5 – Jan 18, 2023</p> <p>5 – Jan 24, 2023</p> <p>4 – Jan 30, 2023</p> <p>6 – Feb 3, 2023</p> <p>10 – Feb 6, 2023</p> <p>11 – Feb 9, 2023</p> <p>9 – Sept 29, 2023</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>g. [REDACTED]</p> <p>h. [REDACTED]</p> <p>i. [REDACTED]</p> <p>j. [REDACTED]</p> <p>k. [REDACTED]</p> <p>l. [REDACTED]</p> <p>m. [REDACTED]</p> <p>n. [REDACTED]</p> <p>o. [REDACTED]</p> <p>p. [REDACTED]</p> <p>8. All communications (including but not limited to text/email/slack) by any OneTaste member regarding [REDACTED] and/or [REDACTED] [REDACTED]</p> <p>9. All communications (including but not limited to text/email/slack) by any OneTaste member regarding allegations of sexual misconduct or abuse in connection with their participation in OneTaste.</p> <p>10. A list of OneTaste’s outside experts hired and the amounts each expert was paid.</p> <p>11. All documents regarding OneTaste’s reconciliation team</p> <p>Hopefully items (1) and (2) should be quick to put together, because it appears that they were used to prepare your presentation yesterday. Beyond those items, one of the top priorities is the production of communications by members of OneTaste’s leadership. We have never received any communications by Nicole Daedone or Rachel Cherwitz (except for a very limited collection of text threads), including the communications they exchanged with each other.</p>	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
Round - 09  2 new requests	VOLUNTARY REQUEST // Dec 20, 2022	1. Can we please have copies of all text/chat messages that [REDACTED] exchanged with [REDACTED]?  2. In addition, can you please provide us with records of all payments made to OneTaste and its leaders and affiliates by [REDACTED]?	
Round - 10  2 new requests	VOLUNTARY REQUEST // Jan 6, 2023	1 - Thank you for sending the recorded interviews. We noticed the interview for [REDACTED] appears to be “Part 2” of a multi-part series, and we believe that during our meeting we were shown excerpts of the first part. Can you please send us the first recording?  2- In addition, would you be willing to share with us the names of the 30-40 individuals who were interviewed?	1 response  2 – Jan 18, 2023 EM
Round - 11  1 new request	VOLUNTARY REQUEST // Jan 19, 2023	1 - Regarding the rent payments – could you please produce any records of rent payments made to a company doing business as Caravan Retreats or confirm that none exist?	1 response  1 – Jan 24, 2023
Round - 12  1 new request	VOLUNTARY REQUEST // Jan 26, 2023	1. In addition, please produce the following: All “fear inventories” or related intake documents for any OneTaste members or employee	
Round - 13  1 new request	VOLUNTARY REQUEST // Feb 10,	1. Are you available for a call sometime next week (beginning on Wednesday, Feb 15) to discuss the video-recorded interviews? <u>In addition, in advance of the call, can you please confirm who conducted the interviews, who was present for the interviews, and when the interviews occurred?</u> (Emphasis added)	
Round - 14	SUBPOENA // Feb 22, 2023	1. Records of payments made by OneTaste by all investors, lenders, partners, acquirers, and owners of any branch of OneTaste, including	10 responses  5 – March 28, 2023

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
4 new requests	<u>Time Period:</u> <u>Jan 1, 2007 to present</u>	<p>but not limited to payments by [REDACTED], [REDACTED], and [REDACTED] [REDACTED] r.</p> <p>2. All communications, including but not limited to email, text and Slack communications, regarding OneTaste by the following individuals:</p> <ol style="list-style-type: none"> <li>1. Nicole Daedone</li> <li>2. [REDACTED]</li> <li>3. Rachael Cherwitz</li> <li>4. [REDACTED]</li> <li>5. [REDACTED]</li> <li>6. [REDACTED]</li> <li>7. [REDACTED]</li> <li>8. [REDACTED]</li> <li>9. [REDACTED]</li> <li>10. [REDACTED]</li> <li>11. [REDACTED]</li> <li>12. [REDACTED]</li> <li>13. [REDACTED]</li> <li>14. [REDACTED]</li> <li>15. [REDACTED]</li> <li>16. [REDACTED]</li> </ol> <p>3. All communications by any OneTaste member regarding [REDACTED] [REDACTED] and/or [REDACTED]</p> <p>4. All communications by any OneTaste member regarding allegations of sexual misconduct or abuse in connection with their participation in OneTaste.</p>	<p>1 – April 3, 2023</p> <p>8 – March 29, 2023</p> <p>7 – April 19, 2023</p> <p>7 – April 26, 2023</p> <p><b>10 – QUASHED  JUDGE PAMELA  K. CHEN</b></p> <p>9 – Aug 28, 2023</p> <p>7 – Sept 14, 2023</p> <p>7 – Sept 22, 2023</p> <p>4 – Sept 29, 2023</p> <p>3 – Oct 21, 2023</p>

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>5. Copies of all communications that [REDACTED] [REDACTED] exchanged with [REDACTED] [REDACTED].</p> <p>6. A list of all current OneTaste employees, their titles, and their dates of employment.</p> <p>7. All documents regarding OneTaste’s course refund policies, and documents sufficient to show any refunds requested and whether they were granted or denied, and the basis for the grant/denial.</p> <p>8. All “Fear Inventories” in your possession, custody or control.</p> <p>9. All spreadsheets, customer lists, records or training materials used and maintained by OneTaste’s sales team.</p> <p>10. Any and all audio or video recordings, or other mechanical recordings in your possession, custody or control which record or reflect statements made by any of the following individuals: [list of 64 video interviewees OneTaste previously supplied]</p>	
<p>Round - 15</p> <p>1 new request</p>	<p>VOLUNTARY REQUEST // March 6, 2023</p>	<p>1. It would be helpful if you could specify which of the individuals in request #10 are current or former employees (and separate between the two categories).</p>	<p>1 response</p> <p>March 8, 2023 EM</p>
<p>Round - 16</p> <p>1 new request</p>	<p>VOLUNTARY REQUEST // March 8, 2023</p>	<p>1. Can you please identify which of these are actual employees (current and former)?</p> <p>2. And can you please let us know the actual employment status of those you flag as the functional equivalent of employees?</p>	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
	March 9, 2023	We want to know which individuals had employment contracts with the company. And if any of those contracts provided for a contractor status, please identify those individuals accordingly.	1 response March 10, 2023 EM
Round - 17 1 new request	VOLUNTARY REQUEST // April 12, 2023	Can you please confirm whether you have responded to Item #6 of the February 21, 2023 subpoena (which requests a list of all current OneTaste employees, their titles, and their dates of employment)? I do not believe we have received a response on that yet, unless I am mistaken. <u>In addition, as I believe we discussed on a prior call, can you please produce to us all agreements with all current and former OneTaste employees, contractors and/or volunteers concerning the terms of their responsibilities and compensation?</u> We are happy to make the request by subpoena if needed. [emphasis added]	1 response May 4, 2023
Round - 18 1 new request	VOLUNTARY REQUEST // May 2, 2023	Can you please send us a list of all attorneys and law firms who have represented OneTaste (presently or previously), and their contact information?	1 response May 3, 2023 EM
Round - 19 13 new requests	SUBPOENA // Aug 28, 2023  <u>Time Period:</u> <u>Jan 1, 2008 to Jan 1, 2019</u>	1. All communications, including but not limited to email, text and Slack communications, sent to or received by Nicole Daedone and/or Rachel Cherwitz regarding the following:  a. Romantic or sexual relationships among OneTaste clients, contractors and employees; b. Instructions to engage in sexual acts; c. Any previous or contemporaneous trauma experienced by clients, volunteers, contractors and employees; d. Employee or contractor reassignments to different OneTaste locations; e. Payments to OneTaste employees or contractors; f. [REDACTED]	



REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		<p>g. Individuals identified as “VIPs,” including by not limited to potential or current OneTaste benefactors, investors and clients;</p> <p>h. Allegations involving incidents of alleged sexual or physical abuse or misconduct;</p> <p>i. Rachel Cherwitz’s departure from OneTaste.</p> <p>2. All documents and communications, including but not limited to email, text and Slack communications, by any OneTaste member regarding [REDACTED] demand letter to OneTaste, the subsequent mediation between OneTaste and [REDACTED] in December 2015, and OneTaste’s settlement agreement with [REDACTED]</p> <p>3. All documents regarding Nicole Daedone Intensive courses held in 2018.</p> <p>4. Documents sufficient to identify all corporate entities, trusts, non-profit organizations, and businesses affiliated with OneTaste.</p> <p>5. Documents sufficient to identify the host of the @onetaste.us email domain and where emails sent or received using the @onetaste.us email domain are stored.</p>	
	Nov 17, 2023	I wanted to follow up regarding our prior conversation about Request 1 of the attached subpoena. Of Request 1, we would still request that you provide items 1(e), 1(g) and 1(i). Can you please confirm whether you intend to comply with those requests?	



## Make a Reservation

**ONETASTE INCORPORATED vs AYRIES BLANCK**

Case Number: 22STCV33093 Case Type: Civil Unlimited Category: Contractual Fraud

Date Filed: 2022-10-07 Location: Stanley Mosk Courthouse - Department 28

### Reservation

Case Name: ONETASTE INCORPORATED vs AYRIES BLANCK	Case Number: 22STCV33093
Type: Informal Discovery Conference (IDC)	Status: RESERVED
Filing Party: Onetaste, Incorporated (Plaintiff)	Location: Stanley Mosk Courthouse - Department 28
Date/Time: 06/13/2024 9:00 AM	Number of Motions: 1
Reservation ID: 488053337473	Confirmation Code: CR-9NNT4AU5BAHY32NWD

### Fees

Description	Fee	Qty	Amount
Informal Discovery Conference (IDC)	0.00	1	0.00
<b>TOTAL</b>			<b>\$0.00</b>

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: 1969-12-31	

[Print Receipt](#)

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