

DOCUMENT DEMAND

1. All DOCUMENTS supporting the allegations in the first, second, and third sentences of paragraph 3 of YOUR COMPLAINT.
2. All DOCUMENTS supporting the allegations in the first and second sentences of paragraph 4 of YOUR COMPLAINT.
3. All DOCUMENTS supporting the allegations in paragraph 4a of YOUR COMPLAINT.
4. All DOCUMENTS supporting the allegations in paragraph 4b of YOUR COMPLAINT.
5. All DOCUMENTS supporting the allegations in paragraph 5a of YOUR COMPLAINT.
6. All DOCUMENTS supporting the allegations in paragraph 5b of YOUR COMPLAINT.
7. All DOCUMENTS supporting the allegations in the first sentence of paragraph 5c of YOUR COMPLAINT.
8. All DOCUMENTS supporting the allegations in paragraph 5d of YOUR COMPLAINT.
9. All DOCUMENTS supporting the allegations in paragraph 5e of YOUR COMPLAINT.
10. All DOCUMENTS supporting the allegations in paragraph 5f of YOUR COMPLAINT.
11. All DOCUMENTS supporting the allegations in paragraph 5g of YOUR COMPLAINT.
12. All DOCUMENTS supporting the allegations in paragraph 5 h of YOUR

DOCUMENT DEMAND

COMPLAINT.

13. All DOCUMENTS supporting the allegations in paragraph 5h i of YOUR COMPLAINT.

14. All DOCUMENTS supporting the allegations in paragraph 5h ii of YOUR COMPLAINT.

15. All DOCUMENTS supporting the allegations in paragraph 5h iii of YOUR COMPLAINT.

16. All DOCUMENTS containing, recording, reporting, or referring to the “many valid reasons” stated in paragraph 5h iv of YOUR COMPLAINT.

17. All DOCUMENTS recording, reporting, and/or identifying the “fully latent defects” discovered after the close of escrow as referenced in paragraph 5h v of YOUR COMPLAINT.

18. All DOCUMENTS recording, reporting, and/or identifying the “larger acts of fraud by the contractors” stated in paragraph 5 h v of YOUR COMPLAINT.

19. All DOCUMENTS supporting the allegations in paragraph 5h vi of YOUR COMPLAINT.

20. All DOCUMENTS supporting the allegations in paragraph 5h vii of YOUR COMPLAINT.

21. All DOCUMENTS containing, recording, or reporting any part of the “all-encompassing scheme” referenced in paragraph 6 of YOUR COMPLAINT.

22. All DOCUMENTS containing, recording, or reporting the acts of fraud committed against Micah Forstein as referenced in paragraph 6a of YOUR COMPLAINT.

DOCUMENT DEMAND

23. All DOCUMENTS supporting the allegation in paragraph 6a [sic] of YOUR COMPLAINT that licensed contractors committed “gross acts of fraud which would have been known to seller.”

24. All DOCUMENTS supporting the allegation in paragraph 6a [sic] of YOUR COMPLAINT that the licensed contractors “took shortcuts when concealing old and structural defects.”

25. All DOCUMENTS supporting the allegations in paragraph 8d of YOUR COMPLAINT.

26. All DOCUMENTS supporting the claim in paragraph 9 and elsewhere of YOUR COMPLAINT that “Plaintiffs were harmed by over \$250,000.”

27. All COMMUNICATIONS between YOU and any of the “oversight agencies” referenced in paragraph 9c of YOUR COMPLAINT.

28. All DOCUMENTS not included in YOUR responses to any of the previous requests that support the allegations in paragraph 11 of YOUR COMPLAINT.

29. All DOCUMENTS supporting the allegations in paragraph 11b of YOUR COMPLAINT.

30. All DOCUMENTS supporting the allegations in paragraph 16 of YOUR COMPLAINT.

31. All DOCUMENTS supporting the allegations in paragraph 17a of YOUR COMPLAINT.

32. All DOCUMENTS supporting the allegations in paragraph 17b of YOUR COMPLAINT.

33. All DOCUMENTS supporting the allegations in paragraph 17c of YOUR

DOCUMENT DEMAND

COMPLAINT.

34. All DOCUMENTS describing, showing, recording, or reporting to the “many other defects” referenced in paragraph 17e of YOUR COMPLAINT.

35. All DOCUMENTS containing, recording, or reporting the “attestation statements from neighbors who had been in the home” referenced in paragraph 17e of YOUR COMPLAINT.

36. All DOCUMENTS supporting the allegations in paragraph 18 of YOUR COMPLAINT.

37. All DOCUMENTS supporting the allegations in paragraph 20 of YOUR COMPLAINT.

38. All DOCUMENTS supporting the allegations in paragraph 21 of YOUR COMPLAINT.

39. All DOCUMENTS supporting the allegations in paragraph 22 of YOUR COMPLAINT.

40. All DOCUMENTS supporting the allegations in paragraph 23 of YOUR COMPLAINT.

41. All DOCUMENTS supporting the allegations in the third and fourth sentences of paragraph 24 of YOUR COMPLAINT.

42. All DOCUMENTS supporting the allegations in paragraph 25 of YOUR COMPLAINT.

43. All DOCUMENTS not included in YOUR responses to any previous request supporting the allegations in paragraph 26 of YOUR COMPLAINT.

44. All DOCUMENTS supporting the allegations in paragraph 27 of YOUR

DOCUMENT DEMAND

COMPLAINT.

45. All DOCUMENTS not included in YOUR responses to any previous request supporting the allegations in paragraph 28 of YOUR COMPLAINT.

46. All DOCUMENTS not included in YOUR responses to any previous request supporting the allegations in paragraph 29 of YOUR COMPLAINT.

47. All DOCUMENTS not included in YOUR responses to any previous request supporting the allegations in paragraph 30 of YOUR COMPLAINT.

48. All DOCUMENTS not included in YOUR responses to any previous request supporting the allegations in paragraph 31 of YOUR COMPLAINT.

49. All DOCUMENTS supporting the allegations in paragraph 32 of YOUR COMPLAINT.

50. The notice referred to in paragraph 33 of YOUR COMPLAINT.

51. The demand referred to in paragraph 34 of YOUR COMPLAINT.

52. The demands referred to in paragraph 35 of YOUR COMPLAINT.

53. The “passionately written, 20+ page written response to questions” referred to in paragraph 36 of YOUR COMPLAINT.

54. The notice from YOUR landlord referenced in paragraph 37 of YOUR COMPLAINT.

55. All COMMUNICATIONS with “other agents” referenced in paragraph 38 of YOUR COMPLAINT.

56. All COMMUNICATIONS containing, recording, or reporting what Plaintiffs were told as referred to in paragraph 41c of YOUR COMPLAINT.

57. All COMMUNICATIONS containing, recording, or reporting what

DOCUMENT DEMAND

Plaintiffs were told as referenced in paragraph 41d of YOUR COMPLAINT.

58. All COMMUNICATIONS with the Attorney referenced in the “NOTE” at the end of paragraph 41 of YOUR COMPLAINT.

59. All COMMUNICATIONS containing, recording, or reporting the “dialogue” referenced in paragraph 41e of YOUR COMPLAINT.

60. All COMMUNICATIONS containing, recording, or reporting the conversations described in paragraph 47 of YOUR COMPLAINT.

61. The emails referred to in paragraphs 48c and 48d of YOUR COMPLAINT.

62. All DOCUMENTS comprising, containing, recording, or reporting the dozens of acts of fraud YOU claim “Plaintiffs documented” in paragraph 49a of YOUR COMPLAINT.

63. All COMMUNICATIONS between YOU and the Real Estate Licensees and two Attorneys referenced in paragraph 48b of YOUR COMPLAINT.

64. All DOCUMENTS supporting the allegations in paragraph 50 of YOUR COMPLAINT.

65. All DOCUMENTS describing, reporting, or recording the \$60,000-80,000 in “non-disclosed material facts” referenced in paragraph 51 of YOUR COMPLAINT.

66. All DOCUMENTS describing, reporting, or recording the “\$150,000+ in latent defects and utility bill misrepresentations” referenced in paragraph 52 of YOUR COMPLAINT.

67. All DOCUMENTS supporting the allegations in the “NOTE” section of paragraph 57 of YOUR COMPLAINT.

68. All DOCUMENTS describing, reporting, or recording the “personal injury”

DOCUMENT DEMAND

referenced in paragraph 59 of YOUR COMPLAINT.

69. All DOCUMENTS supporting the allegations in paragraph 61c of YOUR COMPLAINT.

70. All COMMUNICATIONS between YOU and any other PERSON in which YOU explained why YOU and Holly Bowers did not exit the transaction as described in paragraph 70c of YOUR COMPLAINT.

71. All DOCUMENTS containing, recording, or reporting the economic damages YOU and Holly Bowers would have incurred had YOU withdrawn from the transaction.

72. All DOCUMENTS supporting the claim that YOU have suffered non-economic damages as referred to in paragraph 78 of YOUR COMPLAINT.

73. All DOCUMENTS supporting the allegations in paragraph 84d of YOUR COMPLAINT.

74. All DOCUMENTS supporting the allegations in paragraph 84f i of YOUR COMPLAINT.

75. All DOCUMENTS supporting the allegations in paragraph 85d of YOUR COMPLAINT.

76. All DOCUMENTS containing, recording, or reporting repairs to the subject property paid for by YOU.

77. All DOCUMENTS supporting the allegations in paragraph 92 of YOUR COMPLAINT.

78. If YOU or Holly Bowers are claiming damages for “stress on relationships,” all DOCUMENTS supporting the allegations in paragraph 94 of YOUR

DOCUMENT DEMAND

COMPLAINT.

79. If YOU or Holly Bowers are claiming damages for “violation of privacy,” all DOCUMENTS supporting the allegations in paragraph 95 of YOUR COMPLAINT.

80. All DOCUMENTS containing, recording, or reporting the “extreme behavior” referenced in paragraph 96 of YOUR COMPLAINT.

81. If YOU or Holly Bowers are claiming damages for “stigmatization,” all DOCUMENTS supporting the allegations in paragraph 96 of YOUR COMPLAINT.

82. All complaints referred to in paragraph 98 of YOUR COMPLAINT.

83. All responses to any of the complaints referenced in paragraph 98 of YOUR COMPLAINT.

84. All photographs of the repairs referenced in paragraph 99 of YOUR COMPLAINT.

85. All receipts for materials for repairs referenced in paragraph 99 of YOUR COMPLAINT.

86. All DOCUMENTS reporting, recording, or otherwise supporting the claims for emotional distress alleged in the Fourth Cause of Action in YOUR COMPLAINT.

87. All DOCUMENTS supporting the allegation in the Fourth Cause of Action in YOUR COMPLAINT that the home has been under construction for 3 years and that YOU have had to use over \$100,000 at 12%.

88. All DOCUMENTS not included in YOUR response to any previous request supporting the claim for emotional distress damages claimed in the Fifth Cause of Action in YOUR COMPLAINT.

89. All COMMUNICATIONS between YOU and Coldwell Banker or any

DOCUMENT DEMAND

employee or agent therein.

90. All COMMUNICATIONS between YOU and any other licensed real estate agent pertaining to YOUR purchase of the subject property.

91. All COMMUNICATIONS between YOU and any California licensed contractor pertaining to the subject property.

92. All DOCUMENTS not included in YOUR responses to any previous request supporting YOUR allegation that Micah Forstein engaged in a conspiracy with his real estate agent.

93. All DOCUMENTS supporting the allegation in paragraph 92 of YOUR COMPLAINT that “the buyers were faced with a ‘hopeless situation.’”

94. All DOCUMENTS reporting or recording the stress on YOUR relationship with YOUR partner as asserted in paragraph 94 of YOUR COMPLAINT.

95. All DOCUMENTS reporting or recording the stress on YOUR occupations as asserted in paragraph 94 of YOUR COMPLAINT.

96. All online postings YOU have made which mention or refer to Micah Forstein.

97. All COMMUNICATIONS that YOU have had, in any form, with any other PERSON or entity, which mention or refer to Micah Forstein.

98. All DOCUMENTS supporting the allegation in paragraph 96 of YOUR COMPLAINT that “Plaintiffs have been stigmatized.”

99. All DOCUMENTS containing, recording, or reporting the “details” of frauds committed by each Agency as alleged in paragraph 98 of YOUR COMPLAINT.

100. All DOCUMENTS recording or reporting the repairs completed by

DOCUMENT DEMAND

Plaintiffs as alleged in paragraph 99 of YOUR COMPLAINT.

101. All estimates referred to in paragraph 99 of YOUR COMPLAINT.

102. All COMMUNICATIONS between YOU and any prospective tenants for rental of any part of the subject property.

103. All COMMUNICATIONS containing, recording or reporting the “1000’s of hours” of conversations referenced on lines 24-25 of page 45 of YOUR COMPLAINT.