

SPECIAL INTERROGATORIES

1. State all facts supporting the allegations in paragraph 3 of YOUR COMPLAINT. “YOU” and “YOUR” mean Bryan Canary. “COMPLAINT” means the complaint filed by Bryan Canary and Holly Bowers against Micah Forstein, Monterey County Superior Court Case No. 24CV001914.

2. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 3 of YOUR COMPLAINT. “IDENTIFY” when used in relation to a person means to state the person’s full name, last known address, including city, state and zip code, email address(es) and telephone number(s).

3. State all facts supporting the allegations in the first and second sentences of paragraph 4 of YOUR COMPLAINT.

4. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in the first and second sentences of paragraph 4 of YOUR COMPLAINT.

5. State all facts supporting the allegations in paragraph 5a of YOUR COMPLAINT.

6. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 5a of YOUR COMPLAINT.

7. State all facts supporting the allegations in paragraph 5b of YOUR COMPLAINT.

8. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 5b of YOUR COMPLAINT.

9. State all facts supporting the allegations in paragraph 5e of YOUR COMPLAINT.

10. IDENTIFY all witnesses with knowledge of any facts supporting the

SPECIAL INTERROGATORIES

allegations in paragraph 5e of YOUR COMPLAINT.

11. State all facts supporting the allegations in paragraph 5f of YOUR COMPLAINT.

12. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 5f of YOUR COMPLAINT.

13. State all facts supporting the allegations in paragraph 5g of YOUR COMPLAINT.

14. State all facts supporting the allegations in paragraph 5h of YOUR COMPLAINT.

15. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 5h of YOUR COMPLAINT.

16. State all facts supporting the allegations in paragraph 5h of YOUR COMPLAINT.

17. Describe in detail the “many valid reasons” referenced in paragraph 5h iv of YOUR COMPLAINT.

18. IDENTIFY all witnesses with knowledge of any of the “many valid reasons” referenced in paragraph 5h iv of YOUR COMPLAINT.

19. Describe in detail all of the “fully latent defects” referenced in paragraph 5h v of YOUR COMPLAINT.

20. IDENTIFY all witnesses with knowledge of the “fully latent defects” referenced in paragraph 5h v of YOUR COMPLAINT.

21. State the date(s) that each of the “fully latent defects” were discovered.

22. State how each of the “fully latent defects” were discovered.

SPECIAL INTERROGATORIES

23. Describe in detail the “large acts of fraud by the contractors” referenced in paragraph 5h v of YOUR COMPLAINT.

24. Describe the damage “that (was) understood at the time of the close of escrow” referenced in paragraph 5h v of YOUR COMPLAINT.

25. When was the damage referenced in paragraph 5h vi of YOUR COMPLAINT discovered?

26. If YOU claim damages as a result of inconsistent utility bill pricing, state the amount of damages claimed and explain how that was calculated.

27. Fully describe the “all encompassing scheme” referenced in paragraph 6 of YOUR COMPLAINT.

28. Describe all acts of fraud that YOU allege Micah Forstein committed in paragraph 6a of YOUR COMPLAINT.

29. Describe all “gross acts of fraud” which YOU allege were committed by licensed contractors in paragraph 6a [sic] of YOUR COMPLAINT.

30. IDENTIFY all witnesses with knowledge of any of the “gross acts of fraud” which YOU allege were committed by licensed contractors in paragraph 6a [sic] of YOUR COMPLAINT.

31. IDENTIFY all areas where the licensed contractors concealed mold and structural defects as alleged in paragraph 6a [sic] of YOUR COMPLAINT.

32. Describe all of the “shortcuts” that YOU allege were taken by the licensed contractors in paragraph 6a [sic] of YOUR COMPLAINT.

33. State all facts supporting the allegations in paragraph 8d of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

34. IDENTIFY all witnesses supporting the allegations in paragraph 8d of YOUR COMPLAINT.

35. State all facts supporting the claim in paragraph 9 and elsewhere in YOUR COMPLAINT that Plaintiffs were harmed by over \$250,000.

36. State all facts supporting the assertion in paragraph 9 of YOUR COMPLAINT that YOUR claims were “non-pursuable for almost three years.”

37. IDENTIFY all witnesses with knowledge of any facts supporting the assertion in paragraph 9 of YOUR COMPLAINT that YOUR claims were “non-pursuable for almost three years.”

38. State all facts supporting the allegations in paragraph 11 of YOUR COMPLAINT.

39. IDENTIFY all witnesses supporting the allegations in paragraph 11 of YOUR COMPLAINT.

40. IDENTIFY every PERSON who described Micah Forstein and his family as hoarders as asserted in paragraph 16 of YOUR COMPLAINT.

41. IDENTIFY all witnesses with knowledge of any of the “numerous serious moisture/mold related conditions” alleged in paragraph 17a of YOUR COMPLAINT.

42. Describe and specify the location of each of the “structural issues” alleged in paragraph 17b of YOUR COMPLAINT.

43. IDENTIFY all witnesses with knowledge of any of the “structural issues” alleged in paragraph 17b of YOUR COMPLAINT.

44. Describe the location of each of the major pet urine issues alleged in paragraph 17c of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

45. Describe and specify the location of each of the “many other defects” alleged in paragraph 17d of YOUR COMPLAINT.

46. State all facts supporting the allegations in paragraph 17e of YOUR COMPLAINT.

47. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 17e of YOUR COMPLAINT.

48. State all facts supporting the allegations in paragraph 20 of YOUR COMPLAINT.

49. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 20 of YOUR COMPLAINT.

50. State all facts supporting the allegations in paragraph 21 of YOUR COMPLAINT.

51. State all facts supporting the allegations in paragraph 23 of YOUR COMPLAINT.

52. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 23 of YOUR COMPLAINT.

53. State all facts supporting the allegations in paragraph 24 of YOUR COMPLAINT.

54. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 24 of YOUR COMPLAINT.

55. State all facts supporting the allegations in paragraph 25 of YOUR COMPLAINT.

56. State all facts supporting the allegations in paragraph 26 of YOUR

SPECIAL INTERROGATORIES

COMPLAINT.

57. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 26 of YOUR COMPLAINT.

58. State all facts supporting the allegations in paragraph 27 of YOUR COMPLAINT.

59. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 27 of YOUR COMPLAINT.

60. State all facts supporting the allegations in paragraph 28 of YOUR COMPLAINT.

61. State all facts supporting the allegations in paragraph 29 of YOUR COMPLAINT.

62. State all facts supporting the allegations in paragraph 30 of YOUR COMPLAINT.

63. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 30 of YOUR COMPLAINT.

64. State all facts supporting the allegations in paragraph 31 of YOUR COMPLAINT.

65. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 31 of YOUR COMPLAINT.

66. State all facts supporting the allegations in paragraph 32 of YOUR COMPLAINT.

67. IDENTIFY all witnesses with knowledge of any facts supporting the notice referenced in paragraph 32 of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

68. IDENTIFY all witnesses with knowledge of any facts supporting the demand referenced in paragraph 34 of YOUR COMPLAINT.

69. State all facts supporting the allegations in paragraph 34 of YOUR COMPLAINT.

70. State all facts supporting the allegation that Plaintiffs had a “right as title holders after the contract acceptance” to make the demands referenced in paragraph 35 of YOUR COMPLAINT.

71. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS with “other agents” as referenced in paragraph 38 of YOUR COMPLAINT.

72. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS containing, recording, or reporting what Plaintiffs were told as referred to in paragraph 41c of YOUR COMPLAINT.

73. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS containing, recording, or reporting what Plaintiffs were told as referred to in paragraph 41d of YOUR COMPLAINT.

74. IDENTIFY the Attorneys referenced in the “NOTE” at the end of paragraph 41 of YOUR COMPLAINT.

75. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS containing, recording, or reporting the “dialogue” referenced in paragraph 41e of YOUR COMPLAINT.

76. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS containing, recording, or reporting the conversations referenced in paragraph 47i of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

77. IDENTIFY all witnesses with knowledge of the emails referred to in paragraphs 48c and 48d of YOUR COMPLAINT.

78. State all facts supporting the allegations in paragraph 49 of YOUR COMPLAINT.

79. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 49 of YOUR COMPLAINT.

80. IDENTIFY the Real Estate Licensees and two Attorneys referenced in paragraph 49b of YOUR COMPLAINT.

81. State all facts supporting the allegations in paragraph 50 of YOUR COMPLAINT.

82. IDENTIFY all witnesses with knowledge of the allegations in paragraph 50 of YOUR COMPLAINT.

83. State all facts supporting the allegations that there were \$60,000-80,000 in “non-disclosed material facts” referenced in paragraph 51 of YOUR COMPLAINT.

84. State all facts supporting the allegations that there were “\$150,000+ in latent defects and utility bill misrepresentations” referenced in paragraph 52 of YOUR COMPLAINT.

85. State all facts supporting the allegations in paragraph 57 of YOUR COMPLAINT.

86. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 57 of YOUR COMPLAINT.

87. State all facts supporting the allegations in paragraph 61c of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

88. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 61c of YOUR COMPLAINT.

89. IDENTIFY all witnesses with knowledge of any COMMUNICATIONS in which YOU explained why YOU and Holly Bowers did not exit the transaction as described in paragraph 70c of YOUR COMPLAINT.

90. State all facts supporting the claim that YOU and Holly Bowers would have incurred economic damages had YOU withdrawn from the transaction.

91. IDENTIFY all witnesses with knowledge of the facts supporting the economic damages YOU and Holly Bowers would have incurred had YOU withdrawn from the transaction.

92. State all facts supporting the claim that YOU have suffered non-economic damages as referred to in paragraph 78 of YOUR COMPLAINT.

93. IDENTIFY all witnesses with knowledge of the facts supporting the claim that YOU have suffered non-economic damages as referred to in paragraph 78 of YOUR COMPLAINT.

94. State all facts supporting the allegations in paragraph 84 of YOUR COMPLAINT.

95. IDENTIFY all witnesses with knowledge of the facts supporting the allegations in paragraph 84 of YOUR COMPLAINT.

96. State all facts supporting the allegations in paragraph 92 of YOUR COMPLAINT.

97. IDENTIFY all witnesses with knowledge of any facts supporting the allegations in paragraph 92 of YOUR COMPLAINT.

SPECIAL INTERROGATORIES

98. State all facts supporting the “stress on relationships” allegations in paragraph 94 of YOUR COMPLAINT.

99. IDENTIFY all witnesses with knowledge of any facts supporting the “stress on relationships” allegations in paragraph 94 of YOUR COMPLAINT.

100. State all facts supporting the “violation of privacy” allegations in paragraph 95 of YOUR COMPLAINT.

101. IDENTIFY all witnesses with knowledge of any facts supporting the “violation of privacy” allegations in paragraph 95 of YOUR COMPLAINT.

102. State all facts supporting the “stigmatization” allegations in paragraph 96 of YOUR COMPLAINT.

103. IDENTIFY all witnesses with knowledge of any facts supporting the “stigmatization” allegations in paragraph 96 of YOUR COMPLAINT.

104. State all facts supporting the complaints referred to in paragraph 98 of YOUR COMPLAINT.

105. IDENTIFY all witnesses with knowledge of any facts supporting the complaints referred to in paragraph 98 of YOUR COMPLAINT.

106. State all facts 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%.

107. IDENTIFY all witnesses with knowledge of any facts 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%.

108. State all facts supporting YOUR allegation that Micah Forstein engaged in

SPECIAL INTERROGATORIES

a conspiracy with his real estate agent.

109. State all facts supporting the allegation in paragraph 92 of YOUR COMPLAINT that “the buyers were faced with a ‘hopeless situation.’”

110. State all facts supporting the allegation of the stress on YOUR relationship with YOUR partner as asserted in paragraph 94 of YOUR COMPLAINT.

111. State all facts supporting the allegation of stress on YOUR occupations as asserted in paragraph 94 of YOUR COMPLAINT.

112. IDENTIFY all witnesses with knowledge of any facts supporting the allegation of stress on YOUR occupations as asserted in paragraph 94 of YOUR COMPLAINT.

113. IDENTITY all PERSONS with which YOU have had any COMMUNICATIONS with, in any form, which mention or refer to Micah Forstein.

114. State all facts supporting the allegation in paragraph 96 of YOUR COMPLAINT that “Plaintiffs have been stigmatized.”

115. State all facts supporting the “details” of frauds committed by each Agency as alleged in paragraph 98 of YOUR COMPLAINT.

116. IDENTIFY all witnesses with knowledge of the repairs completed by Plaintiffs as alleged in paragraph 99 of YOUR COMPLAINT.

117. IDENTIFY all prospective tenants for rental of the subject property that you have any COMMUNICATIONS with.

118. State all facts supporting the allegation that you had “1000’s of hours” of conversations referenced on lines 24-25 of page 45 of YOUR COMPLAINT.