

EXHIBIT A

RESPONSES FROM DEFENDANT OSKOUIE

REQUEST NO. 1

All documents and communications relied upon or consulted by Defendant Oskouie in responding to BMaddox's First Set of Interrogatories to Defendant Oskouie.

Response No. 1:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 2

All documents and communications concerning BMaddox, Brandon Maddox, the subject

matter of this litigation, or any individual or entity believed by You to be associated with BMaddox or Brandon Maddox.

Response No. 2:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, vague and ambiguous as to the phrase “any individual or entity believed by You to be associated with BMaddox or Brandon Maddox”, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 3

All documents and communications responsive to BMaddox’s First Set of Interrogatories to Defendant Oskouie.

Response No. 3:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

RESPONSES FROM DEFENDANT PLATINUM

REQUEST NO. 1

All documents and communications relied upon or consulted by Defendant Platinum in responding to BMaddox's First Set of Interrogatories to Defendant Platinum.

Response No. 1:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refers Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 2

All documents and communications responsive to BMaddox's First Set of Interrogatories to Defendant Platinum.

Response No. 2:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

RESPONSES FROM DEFENDANT OSKO

REQUEST NO. 1

All documents and communications relied upon or consulted by You in responding to BMaddox's First Set of Interrogatories to Defendant Osko.

Response No. 1:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 2

All documents and communications responsive to BMaddox's First Set of Interrogatories to Defendant Osko.

Response No. 2:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties. Defendant further specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is premature, overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.