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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN MATEO**

JON BJORNSTAD,

Plaintiff,

vs.

HAROLD KINOSHITA and DOES 1 TO 10,  
inclusive,

Defendants.

**CASE NO.: CIV528253**

**RESPONSES TO DEMAND FOR  
INSPECTION AND PRODUCTION OF  
DOCUMENTS**

ASKING PARTY: Defendant, HAROLD KINOSHITA

ANSWERING PARTY: Plaintiff, JON BJORNSTAD

Set No. One

**PRELIMINARY STATEMENT**

Plaintiff's responses set forth below reflects the information that Plaintiff and his counsel have at this time. Plaintiff and his counsel have not fully completed their investigation of the facts relating to this action, have not completed discovery, and have not concluded their preparation for trial. Consequently, these responses are based only on such information and

documents that are presently known and available to Plaintiff after reasonable inquiry. Plaintiff anticipates that further discovery, independent investigation, research, and analysis will supply additional facts and additional meaning to facts presently known. Plaintiff therefore responds to Defendant's Demand for Inspection and Production of Documents without prejudice to his right to amend and/or supplement these responses as new information is discovered; however, in so saying, Plaintiff does not obligate himself to update his responses to any of Demand for Inspection and Production of Documents.

**RESPONSES TO DEMAND FOR INSPECTION AND PRODUCTION OF DOCUMENTS**

**RESPONSE TO DEMAND NO. 1:**

Objection. This request is vague, ambiguous, overly broad and unduly burdensome as phrased.

Without waiving the foregoing objections, plaintiff responds as follows:

The requested documents in plaintiff's possession were previously provided to defendant's insurer. The remaining records, if they exist, are equally available to propounding party via a subpoena duces tecum on all medical care providers identified in plaintiff's responses to Form Interrogatories served simultaneously with this set of discovery responses.

**RESPONSE TO DEMAND NO. 2:**

Other than the Traffic Collision Report for subject accident dated November 21, 2013, bearing Local Report Number R13-11-0444, a copy of which has previously been provided to defendant's insurer, plaintiff has no other documents responsive to this demand.

**RESPONSE TO DEMAND NO. 3:**

Plaintiff is unable to produce documents or things responsive to this demand, for said documents or things are not in his possession, care, custody or control.

RESPONSE TO DEMAND NO. 4:

Plaintiff will produce 20 photographs responsive to this demand.

RESPONSE TO DEMAND NO. 5:

Plaintiff is unable to produce documents or things responsive to this demand, for said documents or things are not in his possession, care, custody or control.

RESPONSE TO DEMAND NO. 6:

The documents responsive to this request regarding plaintiff's bicycle has previously been provided to defendant's insurer.

RESPONSE TO DEMAND NO. 7:

Plaintiff is unable to produce documents or things responsive to this demand, for said documents or things are not in his possession, care, custody or control.

RESPONSE TO DEMAND NO. 8:

Plaintiff is unable to produce documents or things responsive to this demand, for said documents or things are not in his possession, care, custody or control, and plaintiff is not claiming any loss of earnings at this time.

RESPONSE TO DEMAND NO. 9:

Plaintiff is unable to produce documents or things responsive to this demand, for said documents or things are not in his possession, care, custody or control.

RESPONSE TO DEMAND NO. 10:

Objection. This interrogatory is unintelligible as phrased and in the context of the pending litigation. Additionally, this interrogatory seeks discovery of irrelevant information, given the allegations contained in plaintiff's complaint that is not likely to lead to the discovery

of admissible evidence

Dated : June 30, 2014

HABERKORN & ASSOCIATES

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Matthew H. Haberkorn, Esq.  
Attorney for Plaintiff, JON BJORNSTAD