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Attorney for Plaintiff, JON BJORNSTAD

**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 SPECIAL
INTERROGATORIES

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 Special Interrogatories 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 Defendant's Special Interrogatories.

RESPONSES TO SPECIAL INTERROGATORIES

RESPONSE TO SPECIAL INTERROGATORY NO. 1:

Peter Bullock, MD, Arch Street Medical Associates, 143 Birch St. Redwood City, CA 94062 and David Resnick-Sannes, 5403 Scotts Valley Drive #A Scotts Valley, CA 95066.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

In addition to the physicians identified hereinabove in Response to Special Interrogatory No. 1, as well as the physicians and facilities identified in Response to Form Interrogatory No. 6.4 served simultaneously with this set of responses, plaintiff identifies Dominican Hospital, 1555 Soquel Drive, Santa Cruz, CA 95066 where he underwent two inguinal hernia repairs.

RESPONSE TO SPECIAL INTERROGATORY NO. 3:

Objection. This interrogatory is vague, ambiguous, overly broad and unintelligible as phrased in its entirety.

Without waiving the foregoing objection, plaintiff responds as follows:

See Responses to Form Interrogatories served simultaneously with this set of interrogatories.

RESPONSE TO SPECIAL INTERROGATORY NO. 4:

No.

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RESPONSE TO SPECIAL INTERROGATORY NO. 5:

Not applicable.

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

No.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

Prior and at the time of the subject accident, plaintiff had health insurance coverage with Anthem Blue Cross Life and Health Insurance Company, PO Box 60007, Los Angeles, CA 90060-0007; ID No. 276A62381, Group No. 06Z400, Group Name: Small Group PPO. Currently, plaintiff has health insurance coverage with Aetna ID: W2093 73411 Health Plan (80840) 9140860054 GRP: 805470-010-00700.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Medical treatment is ongoing and continuing, so the costs represented herein following represent those payments out-of-pocket to date and for current Explanation of Benefits (“EOBs”) letters received to date:

| | |
|--|----------------|
| Peter Bullock, MD Arch Street Medical | \$303.48 |
| CEP Dekalb Medical Center (emergency room physician billing) | \$185.96 |
| Sequoia Hospital | \$932.39 |
| Evergreen Physical Therapy | \$747.00 |
| Valley Radiology | \$210.28 |
| Yfinite Wellness | \$270.00 |
| <u>Walgreens Pharmacy</u> | <u>\$22.10</u> |
| Total charges to date paid by insurance and out-of-pocket | \$2,671.21 |

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RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Yes, the costs referenced in Response to Special Interrogatory Number 8 above have been paid by plaintiff and/or his health insurance carrier.

RESPONSE TO SPECIAL INTERROGATORY NO. 10:

See Response to Special Interrogatory Numbers 8 and 9 hereinabove.

RESPONSE TO SPECIAL INTERROGATORY NO. 11:

Objection. This interrogatory is vague, ambiguous, overly broad and unintelligible as phrased.

Without waiving the foregoing objections, plaintiff responds as follows:

Plaintiff owes and has paid, or his health insurance carrier has paid, all medical costs incurred to date.

Dated : June 30, 2014

HABERKORN & ASSOCIATES

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