

1 Wilshire Law Firm, PLC
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3 Ryan P. Malloy, Esq. (State Bar No. 317403)
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8 Email: john.lucas@wilshirelawfirm.com

9 Attorneys for Third Party Bobby Saadian

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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

In the matter of:

The Second Amended and Restated George
Saadian Revocable Living Trust, as amended
and restated.

Defendant.

Case No. 23STPB12471

[Assigned to the Hon. Ruben Garcia, Dept. 9]

**DECLARATION OF JOHN J. LUCAS IN
SUPPORT OF OPPOSITION TO MOTION
TO COMPEL COMPLIANCE WITH
SUBPOENA**

Date: August 27, 2026

Time: 9:30 a.m.

Place: Dept. 9

DECLARATION OF JOHN J. LUCAS

I, John J. Lucas, declare, as follows:

1. I am an attorney duly licensed to practice law in the State of California. I make this declaration in support of third party Bobby Saadian's Opposition to the Trustee's Motion to Compel Compliance with Subpoena (the "Motion"). The matters set forth in this declaration are based on my personal knowledge, and if called to testify, I could and would testify competently thereto.

2. I am the General Counsel of Wilshire Law Firm, PLC. Bobby Saadian is the founder and owner. He is also the cousin of Petitioner Jonah Saadian, Brandon Saadian, and Trustee Matthew Barkohanai. The Petition and the dispute underlying the Trust involve those three individuals. Bobby Saadian is not a party to it, a beneficiary of it, and has no connection to the Trust whatsoever.

3. After I reviewed the deposition subpoena at issue, I contacted the Trustee's counsel, Mr. Lysaght, to discuss the subpoena. I informed him that Bobby possesses no knowledge relevant to the Trust litigation, that he has no documents responsive to the requests for production, and that the noticed deposition was unnecessary and harassing in nature. Mr. Lysaght did not engage in any discussion about narrowing the scope of the subpoena, rescheduling the deposition, or otherwise resolving the dispute.

4. On October 31, 2025, I served timely written objections to the deposition subpoena, objecting to the document requests, and stating that Bobby was not available for deposition on November 7, 2025. Attached hereto as Exhibit A is a true and correct copy of those Objections.

5. On December 19, I received an email from Trustee's counsel informing me that she had been improperly attempting to serve Bobby personally with a motion to compel despite knowing that I was representing him.

6. I responded to her, reminding her that I was representing him, and informing her that they had never met and conferred prior to filing the Motion. Accordingly, I requested that she withdraw the Motion in order to meet and confer as the Code requires.

8. On August 5, 2026, I emailed Ms. Riggs, requesting again that she take the Motion off calendar, assuming that she had obtained whatever information through party discovery in the nine months since she filed the Motion.

9. On August 6, she did not address whether she had even attempted to get the information, but refused to withdraw the Motion.

10. On August 11, I responded, offering to provide a declaration from Bobby with the points they would like to establish, so they would have his testimony under oath. I received no response. Attached hereto as Exhibit C is a true and correct copy of that email thread.

11. I have spent, and will spend, substantial time relating to this dispute, including reviewing the Motion papers, preparing this Opposition, reviewing any reply papers, and attending the hearing. I have been practicing for nearly 25 years. Although I do not have a billing rate as General Counsel, a reasonable rate for my experience in this area would be well over \$1,000 per hour. Accordingly, I request that the Court award sanctions against the Trustee in the amount of \$4,000, an amount representing far less than the time I will have spent relating to this dispute.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on August 13, 2026, at Beverly Hills, California.


John J. Lucas

EXHIBIT A

WILSHIRE LAW FIRM, PLC
John J. Lucas, Esq. (SBN: 216236)
660 S. Figueroa St., Sky Lobby
Los Angeles, California 90017
Tel: (213) 381-9988
Fax: (213) 381-9989
John.lucas@wilshirelawfirm.com

Attorney for Third Party Subpoena,
Respondent, BOBBY SAADIAN

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

In the matter of:

The Second Amended and Restated George
Saadian Revocable Living Trust, as amended
and restated.

Defendant.

CASE NO.: 23STPB12471

[Assigned for all purposes to the Hon. Ruben
Garcia, Dept. 9]

**THIRD PARTY BOBBY SAADIAN'S
OBJECTIONS TO SUBPOENA,
DEPOSITION NOTICE, AND DOCUMENT
REQUESTS**

Date: November 7, 2025

Time: 1:00 p.m.

Place: 401 Wilshire Blvd. 12th Floor
Santa Monica, CA 90401

1 Third Party Bobby Saadian (“Responding Party”) hereby responds and objects to the
2 Subpoena, Deposition Notice, and accompanying document requests (sometimes collectively
3 referred to as the “Notice”) of Trustee and Respondent Matthew Barkohanai (“Trustee”), as
4 follows:

5 **OBJECTIONS TO DEPOSITION NOTICE AND SUBPOENA**

6 1. Responding Party objects to the Deposition Notice and Subpoena on the grounds
7 that Responding Party has no knowledge relevant to the dispute, is neither a trustee or
8 beneficiary of the subject trust, and has no documents responsive to the attached requests that
9 could be relevant to this dispute. Responding Party’s counsel informed Trustee’s counsel of
10 these facts, but Trustee’s counsel plans to proceed with seeking the deposition and documents
11 anyway, simply to harass Responding Party.

12 2. Responding Party further objects to the Deposition Notice and Subpoena on the
13 grounds that Trustee has access to any information it needs from Petitioners and Trustee,
14 rendering Responding Party’s deposition unnecessary and duplicative. Indeed, Trustee
15 conceded that he has not received documents or testimony from Petitioners, but is seeking this
16 information from Responding Party first, again making clear that the only purpose of this is to
17 harass Responding Party.

18 3. Responding Party further objects to the Deposition Notice and Subpoena on the
19 grounds that Trustee unilaterally selected the date and time of the deposition and Responding
20 Party is unavailable on that date.

21 **RESPONSE TO REQUESTS FOR PRODUCTION**

22 **REQUEST NO. 1:**

23 Printed copies of all communications, including but not limited to text messages,
24 emails, and postings on any social media sites such as Instagram and WhatsApp, between you
25 and any person, including but not limited to Jonah Saadian, relating to Jonah Saadian’s Petition
26 to Remove or Suspend Matthew Barkohanai as trustee of The Second Amended and Restated
27 George Saadian Revocable Living Trust, as amended and restated (“GS TRUST”).

28 **RESPONSE TO REQUEST NO. 1**

Responding Party objects to this request on the grounds that it is vague and ambiguous,
overly broad, vague and ambiguous as to time, not related to the matters in controversy, and
not sufficiently specific. Responding Party further objects to this request on the grounds that it
is burdensome and harassing. Responding Party further objects to this request on the grounds

that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence. Responding Party further objects to this request on the grounds that it purports to seek information that is already in Defendant's possession or that is equally available to Trustee. Responding Party further objects to this request on the grounds that it seeks the disclosure of confidential, proprietary, or sensitive business information or trade secrets of Responding Party and/or third parties. Responding Party further objects to this request on the grounds that it seeks information that is protected by the right of privacy of Responding Party or other persons or entities as guaranteed by the California and United States Constitutions.

REQUEST NO. 2:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, regarding Matthew Barkohanai, from February 1, 2025 to the present.

RESPONSE TO REQUEST NO. 2:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it seeks the disclosure of confidential, proprietary, or sensitive business information or trade secrets of Responding Party and/or third parties. Responding Party further objects to this request on the grounds that it seeks information that is protected by the right of privacy of Responding Party or other persons or entities as guaranteed by the California and United States Constitutions.

REQUEST NO. 3:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, relating to the GS TRUST.

RESPONSE TO REQUEST NO. 3:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and

not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence. Responding Party further objects to this request on the grounds that it purports to seek information that is already in Defendant's possession or that is equally available to Trustee. Responding Party further objects to this request on the grounds that it seeks the disclosure of confidential, proprietary, or sensitive business information or trade secrets of Responding Party and/or third parties. Responding Party further objects to this request on the grounds that it seeks information that is protected by the right of privacy of Responding Party or other persons or entities as guaranteed by the California and United States Constitutions.

REQUEST NO. 4:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, relating to the real property located at 12235 Beach Blvd in Stanton California 90680 (the "Beach Property"), from February 1, 2021 to the present.

RESPONSE TO REQUEST NO. 4:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence.

REQUEST NO. 5:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, relating to the real property located at 405 Evelyn Place, Beverly Hills, California 90210 (the "Evelyn Property"), from February 1, 2021 to the present.

RESPONSE TO REQUEST NO. 5:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence.

REQUEST NO. 6:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, relating to sale of the real property located at 660-670 Monterey Pass Road in Monterey Park, California 91754 ("Monterey Park Property"), from February 1, 2021 to the present.

RESPONSE TO REQUEST NO. 6:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence.

REQUEST NO. 7:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian, relating to GS TRUST accountings from February 1, 2025 to the present.

RESPONSE TO REQUEST NO. 7:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds

1 that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding
2 Party further objects to this request on the grounds that it lacks foundation and assumes facts
3 not in evidence.

4 **REQUEST NO. 8:**

5 Printed copies of all communications, including but not limited to text messages,
6 emails, and postings on any social media sites such as Instagram and WhatsApp, between you
7 and any person, including but not limited to Jonah Saadian, relating to rents paid to Branmark
8 Group for the residential use of the Evelyn Property, from February 1, 2021 to the present.

9 **RESPONSE TO REQUEST NO. 8:**

10 Responding Party objects to this request on the grounds that it is vague and ambiguous,
11 overly broad, vague and ambiguous as to time, not related to the matters in controversy, and
12 not sufficiently specific. Responding Party further objects to this request on the grounds that it
13 is burdensome and harassing. Responding Party further objects to this request on the grounds
14 that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding
15 Party further objects to this request on the grounds that it lacks foundation and assumes facts
16 not in evidence.

17 **REQUEST NO. 9:**

18 Printed copies of all communications, including but not limited to text messages,
19 emails, and postings on any social media sites such as Instagram and WhatsApp, between you
20 and any person, including but not limited to the Jonah Saadian, relating to Jonah Saadian's
21 efforts to name Brandon A. Saadian a beneficiary of the GS TRUST.

22 **RESPONSE TO REQUEST NO. 9:**

23 Responding Party objects to this request on the grounds that it is vague and ambiguous,
24 overly broad, vague and ambiguous as to time, not related to the matters in controversy, and
25 not sufficiently specific. Responding Party further objects to this request on the grounds that it
26 is burdensome and harassing. Responding Party further objects to this request on the grounds
27 that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding
28 Party further objects to this request on the grounds that it lacks foundation and assumes facts
not in evidence. Responding Party further objects to this request on the grounds that it purports
to seek information that is already in Defendant's possession or that is equally available to
Trustee. Responding Party further objects to this request on the grounds that it seeks the
disclosure of confidential, proprietary, or sensitive business information or trade secrets of

Responding Party and/or third parties. Responding Party further objects to this request on the grounds that it seeks information that is protected by the right of privacy of Responding Party or other persons or entities as guaranteed by the California and United States Constitutions.

REQUEST NO. 10:

Printed copies of all communications, including but not limited to text messages, emails, and postings on any social media sites such as Instagram and WhatsApp, between you and any person, including but not limited to Jonah Saadian relating to distributions from the GS TRUST, from February 1, 2021 to the present.

RESPONSE TO REQUEST NO. 10:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it is burdensome and harassing. Responding Party further objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this request on the grounds that it lacks foundation and assumes facts not in evidence. Responding Party further objects to this request on the grounds that it purports to seek information that is already in Defendant's possession or that is equally available to Trustee. Responding Party further objects to this request on the grounds that it seeks the disclosure of confidential, proprietary, or sensitive business information or trade secrets of Responding Party and/or third parties. Responding Party further objects to this request on the grounds that it seeks information that is protected by the right of privacy of Responding Party or other persons or entities as guaranteed by the California and United States Constitutions.

REQUEST NO. 11:

All documents relating to Jonah Saadian's legal costs, including attorney's fees in the Los Angeles Superior Court probate case In the matter of The Second Amended and Restated George Saadian Revocable Living Trust, as amended and restated, L.A.S.C. Case No . 23STPB12471, including but not limited to emails, text messages, copies of confirmations of payments whether by check, draft, Zelle, wire, ACH or Venmo.

RESPONSE TO REQUEST NO. 11:

Responding Party objects to this request on the grounds that it is vague and ambiguous, overly broad, vague and ambiguous as to time, not related to the matters in controversy, and not sufficiently specific. Responding Party further objects to this request on the grounds that it

1 is burdensome and harassing. Responding Party further objects to this request on the grounds
2 that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding
3 Party further objects to this request on the grounds that it lacks foundation and assumes facts
4 not in evidence. Responding Party further objects to this request on the grounds that it purports
5 to seek information that is already in Defendant's possession or that is equally available to
6 Trustee. Responding Party further objects to this request on the grounds that it seeks the
7 disclosure of confidential, proprietary, or sensitive business information or trade secrets of
8 Responding Party and/or third parties. Responding Party further objects to this request on the
9 grounds that it seeks information that is protected by the right of privacy of Responding Party
10 or other persons or entities as guaranteed by the California and United States Constitutions.

11 DATED: October 31, 2025

WILSHIRE LAW FIRM

John J. Lucas

Ryan Malloy

12
13 By: 

John J. Lucas, Esq.

Ryan Malloy, Esq.

Attorneys for Non-Party, Bobby Saadian

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 660 S. Figueroa St., Sky Lobby Los Angeles, CA 90017. **THIRD PARTY BOBBY SAADIAN'S OBJECTIONS TO SUBPOENA, DEPOSITION NOTICE, AND DOCUMENT REQUESTS**, on all interested parties in this action as set forth on the attached service list in the following manner:

- ☐ **BY MAIL:** I am familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.
- ☐ **BY FACSIMILE:** In addition to service by mail as set forth above, a copy of said document(s) was also delivered by facsimile transmission to the addressee(s) pursuant to Code of Civil Procedure §1013(e).
- ☐ **BY OVERNIGHT MAIL:** I caused said document(s) to be picked up via FEDERAL EXPRESS for delivery to the addressee(s) set forth on the attached service list on the next business day.
- ☒ **BY PERSONAL SERVICE:** I caused said document(s) to be delivered via personal delivery to the addressee(s) set forth on the attached service list.
- ☒ **BY ELECTRONIC SERVICE:** Pursuant to the agreement of the parties, I caused said document(s) to be delivered via electronic mail to the addressee(s) set forth on the attached service list.
- ☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ☐ **FEDERAL:** I declare that I am employed in the office of the member of the bar of this court at whose direction the service was made.

Executed on October 31, 2025, at Los Angeles, California.

FABIOLA COVARRUBIAS

SERVICE LIST

Lysaght Law Group LLP 401 Wilshire Blvd., 12 th Floor Santa Monica, CA 90401 Bryan C. Lysaght, Esq., blysaght@lysaghtlegal.com Natasha Riggs, Esq. nriggs@lysaghtlegal.com	Attorneys for Matt Barkohanai, Trustee
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EXHIBIT B

. TRUSTEE AND RESPONDENT MATTHEW BARKOHANAI'S NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING NON PARTY BOBBY B. SAADIAN'S COMPLIANCE WITH DEPOSITION SUBPOENA; REQUEST FOR MONETARY AND CONTEMPT SANCTIONS IN THE AMOUNT OF \$4,910.00; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF NATASHA RIGGS, BRIAN C. LYSAGHT AND MATTHEW BARKOHANAI; EXHIBITS A-I;

2. SEPARATE STATEMENT IN SUPPORT OF TRUSTEE AND RESPONDENT MATTHEW BARKOHANAI'S NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING NON PARTY BOBBY B. SAADIAN'S COMPLIANCE WITH DEPOSITION SUBPOENA AND REQUEST FOR MONETARY AND CONTEMPT SANCTIONS IN THE AMOUNT OF \$4,910.00;

3. PROOF OF SERVICE.

Natasha Riggs

Lysaght Law Group LLP

401 Wilshire Blvd., 12th Flr., #1004

Santa Monica, CA 90401

Tel: 424-252-4747

On Fri, Dec 19, 2025 at 4:15 PM John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

I've never had to do that in 24 years of practice. You know I'm representing him because, as I reminded you below, you have directed all communications to me, and not to him, I, and not he, served the objections to the subpoena and deposition notice, and you're corresponding with me, and not him, right now. Do you suddenly have some sort of doubt that I'm representing him? Just email me the motion and do not attempt to contact him. I'm happy to file something with the bar if you disregard my repeated warnings, especially with the record of these emails.



John Lucas, Esq.
General Counsel

Wilshire Law Firm, PLC | (213) 381-9988 Ext. 571

Toll Free: (800) 52-CRASH | FAX: (213) 381-9989

660 S. Figueroa St., Sky Lobby, Los Angeles, CA 90017

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From: Natasha Riggs <nriggs@lysaghtlegal.com>
Sent: Friday, December 19, 2025 4:07 PM
To: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>
Cc: BLysaght <blysaght@lysaghtlegal.com>
Subject: Re: Motion for Order re Compliance with Subpoena

Please send a writing from the witness confirming you are authorized.

Natasha Riggs, Esq.
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr.
Santa Monica, CA 90401
Tel: 424.252.4747

On Dec 19, 2025, at 4:01 PM, John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

Well, apparently, we can argue if your attempts to meet and confer were sufficient in the papers. In addition, the motion does NOT need to be personally served on the individual if he or she is represented by counsel, which you know that he is. But if that wasn't clear — which would be astounding at this point since your firm has directed all correspondence and phone calls to me and not to Mr. Saadian — I will accept service of the motion, and if you attempt to contact Mr. Saadian personally in any way, I will seek sanctions against you and your firm.

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From: Natasha Riggs <nriggs@lysaghtlegal.com>

Sent: Friday, December 19, 2025 3:56 PM

To: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>

Cc: BLysaght <blysaght@lysaghtlegal.com>

Subject: Re: Motion for Order re Compliance with Subpoena

John,

You are misguided. You failed to respond to our requests to meet and confer and put your client in this position.

I'm sure you know the motion must be personally served. The only exception is if the witness provides a writing stating that he authorizes you to accept service.

We can withdraw the motion after the witness appears, testifies and produces the requested documents.

Natasha Riggs, Esq.
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr.
Santa Monica, CA 90401

On Dec 19, 2025, at 3:32 PM, John Lucas, Esq.

<john.lucas@wilshirelawfirm.com> wrote:

Hi, Natasha. We never met and conferred about any motion for compliance, which is, of course, required prior to filing any motion to compel. I don't know what's in the declaration supporting the motion, but leaving a voicemail with nothing else is woefully insufficient if your firm claims you attempted to meet and confer but couldn't do so. Please withdraw the motion and let's set a time to meet and confer. In addition, your firm knows that I am the attorney representing Mr. Saadian. Accordingly, do NOT attempt to contact him or serve him directly, or we will seek all appropriate remedies for such obviously unethical conduct. Please direct any and all communications to me.

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From: Natasha Riggs <nriggs@lysaghtlegal.com>
Sent: Friday, December 19, 2025 3:05 PM
To: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>
Cc: BLysaght <blysaght@lysaghtlegal.com>
Subject: Motion for Order re Compliance with Subpoena

Hello John,

It seems that your client Bobby B. Saadian may be avoiding service of our motion seeking his compliance with the subpoena.

Will he authorize you to accept electronic service ? As you know, I would have to receive an email or letter from him so authorizing.

Please let us know by COB today. Otherwise, we have no option but to arrange for service by a Sheriff.

Service attempts will also be presented to the Court if necessary.

Cordially,
Natasha Riggs, Esq.
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr.
Santa Monica, CA 90401
Tel: 424.252.4747

On Dec 1, 2025, at 11:06 AM, Natasha Riggs
<nriggs@lysaghtlegal.com> wrote:

Good Morning Mr. Lucas,
We received no response to our email of November 10 regarding Bobby Saadian's failure to appear. We are writing again to give you the opportunity to schedule the deposition and produced the requested documents before we file motion seeking compliance with the subpoena. We are available this week on Tuesday, Thursday or Friday 11:30 a.m.- 1:30 pm.

Regards,
Natasha Riggs, Esq.
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr.
Santa Monica, CA 90401
Tel: 424.252.4747

On Nov 10, 2025, at 9:57 PM, Brian Lysaght
<blysaght@lysaghtlegal.com> wrote:

You and I discussed the deposition and Saadian's appearance before the depo. We agreed on the date (Nov 7) and that it would have to be live because of videographers. You did not advise at that time any problem with the date or time

Instead, on October 31 you served objections to every category of documents. Included in the objections was a one sentence statement stating that he would not appear for the long scheduled deposition without further explanation.

Your email below says that the deponent will not produce documents because in his opinion he does not possess documents relevant to the trust dispute, a case where he is not a party.

A subpoena is a court order. Your client cannot simply decide for himself whether the subpoenaed documents are relevant to the subject matter or may lead to discovery of admissible evidence. Your client's high handed disregard of that subpoena is contemptuous of the lawful orders of

From the objections and your client's refusal to appear it appears evidence that your position is firm that he will not comply. The same thing is true of the document demands which we also discussed and I told you there were interesting texts directly relevant to the Petition case.

I will thus file a declaration that we have conferred in good faith as required. Said declaration will be appended to our Application for OSC re Contempt or similar coercive relief to compel obedience to the court order.

Let me know if you disagree with any of the foregoing

Brian C. Lysaght
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr., #1004
Santa Monica, CA 90401
Tel: 424.252.4747

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EXHIBIT C

WE WALK SIDE-BY-SIDE WITH OUR CLIENTS IN THE PURSUIT OF JUSTICE



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From: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>

Sent: Tuesday, August 11, 2026 1:38 PM

To: Natasha Riggs <nriggs@lysaghtlegal.com>

Cc: BLysaght <blysaght@lysaghtlegal.com>

Subject: Re: Saadian MTC

We're happy to provide you a declaration under oath. If you want to provide the points that you want to confirm (e.g., that he's not in any way financing the litigation), Bobby can sign it. Will that work?



John Lucas, Esq.
General Counsel

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Toll Free: (800) 926-9799 | FAX: (213) 381-9989

660 S. Figueroa St., Sky Lobby, Los Angeles, CA 90017

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From: Natasha Riggs <nriggs@lysaghtlegal.com>
Sent: Thursday, August 6, 2026 11:05 AM
To: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>
Cc: BLysaght <blysaght@lysaghtlegal.com>
Subject: Re: Saadian MTC

Thank you for your email.

You are incorrect. Your representations regarding your client's knowledge does not substitute for testimony under oath where the witness is subject to cross-examination.

Regards,
Natasha Riggs
Lysaght Law Group LLP
401 Wilshire Blvd., 12th Flr.
Santa Monica, CA 90401
Tel: 424-252-4747

On Wed, Aug 5, 2026 at 4:22 PM John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

Brian and Natasha,

I'm writing regarding the upcoming motion to compel hearing. Since it's been 8 months, I'm assuming that you've completed discovery and taken the depositions of Jonah and Brandon and confirmed that Bobby is not financing the litigation and has no involvement whatsoever with either the litigation or the trust. If so, I'm assuming you'll agree to take the motion off calendar because Bobby has no knowledge of anything relating to the trust. Please let me know. Thanks.

John



John Lucas, Esq.
General Counsel

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 660 S. Figueroa St., Sky Lobby Los Angeles, CA 90017.

On August 14, 2026, I served **DECLARATION OF JOHN J. LUCAS IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL COMPLIANCE WITH SUBPOENA** on all interested parties in this action as set forth on the attached service list in the following manner:

- ☐ **BY MAIL:** I am familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.
- ☐ **BY FACSIMILE:** In addition to service by mail as set forth above, a copy of said document(s) was also delivered by facsimile transmission to the addressee(s) pursuant to Code of Civil Procedure §1013(e).
- ☐ **BY OVERNIGHT MAIL:** I caused said document(s) to be picked up via FEDERAL EXPRESS for delivery to the addressee(s) set forth on the attached service list on the next business day.
- ☐ **BY PERSONAL SERVICE:** I caused said document(s) to be delivered via personal delivery to the addressee(s) set forth on the attached service list.
- ☒ **BY ELECTRONIC SERVICE:** Pursuant to the agreement of the parties, I caused said document(s) to be delivered via electronic mail to the addressee(s) set forth on the attached service list.
- ☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ☐ **FEDERAL:** I declare that I am employed in the office of the member of the bar of this court at whose direction the service was made.

Executed on August 14, 2026, at Los Angeles, California.

FABIOLA COVARRUBIAS

SERVICE LIST

Steven Morris, Esq. Quantum Law Group, LLP 8383 Wilshire Blvd. 935 Beverly Hills, CA 90211 Tel: (323) 955-2600 Direct: (323) 673-7803 Cell/Text: (213) 300-1999 Morris@QuantumLawGroup.com	Attorney for Petitioner, Jonah Saadian
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