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10 Barkohanai, Trustee of The Second Amended
11 and Restated George Saadian Revocable
12 Living Trust, as amended and restated
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SUPERIOR COURT OF 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.

Case No. 23STPB12471

Related Case No. 24STPB00592; 24STPB00604

(Assigned to Hon. Ruben Garcia, Dept. 9)

**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**

Hearing Dated Reserved with Dept. 9

Hearing Date: August 27, 2026

Time: 9:30 a.m.

Dept.: 9

Respondent and movant Matthew Barkohanai, Trustee of The Second Amended and Restated George Saadian Revocable Living Trust submits the following separate statement in support of his motion seeking an order compelling third party Bobby Saadian to comply with the October 7, 2025 deposition subpoena for personal appearance and production of documents and for an award of contempt and monetary sanctions against Saadian in the amount of \$4,910.00.

The subpoena contained eleven requests for production. (Exhibit A to Motion.) In addition to seeking an order compelling the witness to appear and testify at a deposition, the Trustee seeks an order compelling the witness to produce documents responsive to Request No. 1. Saadian served written objections to the subpoena and the requests to produce documents at his deposition. (Exhibit D to Motion.) The witness did not appear at the deposition and has not produced any documents. The objections did not state that witness has no responsive documents.

REQUEST NO. 1:

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 Jonah Saadian's Petition to Remove or Suspend Matthew Barkohanai as trustee of The Second Amended and Restated George Saadian Revocable Living Trust, as amended and restated ("GS TRUST").

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

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

9 **REASONS WHY SAADIAN SHOULD PRODUCE DOCUMENTS RESPONSIVE TO**
10 **REQUEST NO. 1:**

11 The request requires production of all communications relating to Jonah Saadian's
12 petition to remove and surcharge the trustee. If the witness has no knowledge of the
13 petition or information relating to the motives behind it, as he claims, he could so testify
14 under oath. If has no responsive documents, he can testify to that under oath. If the
15 witness has communicated with other persons concerning the removal petition, the
16 documents are relevant to the subject matter and may lead to the discovery of admissible
17 evidence.

18 The objections lack merit and do not justify a refusal to produce. The request is
19 focused and specific, clearly identifying the subject of the communication sought.

20 It is not up to a third-party witness to decide what is relevant, especially in a case
21 where he is not a party. As this witness knows, the standard for relevancy is liberal.
22 (*Williams v. Superior Court* (2017) 3 Cal.5th 531, 557; *Gonzales v. Superior Court* (1995)
23 33 Cal.App.4th 1539, 1546.) Here, the documents sought directly relate to the heart of
24 this litigation - - the petition. The communications are relevant to reasons why the
25 petition was filed and relevant to the Trustee's defenses.

26 The objection that the communications are already in the Trustee's possession and
27 the Petitioner's possession is improper and does not relieve a non party from his
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1 production obligation. Moreover, the communications sought are not limited to
2 communications between the witness and the parties.

3 The objections that the communications are proprietary or confidential are also
4 without merit. The documents requested do not seek information about the witness's law
5 firm or any other of his business practices and procedures.

6 The privacy objection that the request somehow invades some unidentified
7 person's or entity's privacy is also without merit. There is no privacy protection for
8 communications the witness had with the Petitioner or any other person (or entity),
9 whether or not a party to this litigation, about the petition.

10 There is no claim of a privilege. The witness, a lawyer, does not claim he is or was
11 acting as an attorney for the Petitioner. If the witness was asserting some sort of qualified
12 privilege, he would have the burden of establishing preliminary facts essential to such an
13 assertion. (*Gonzales*, 33 Cal.App.4th 1539 at 1548.) Nor has he identified any public
14 policy against production of the documents because there is none.

15 The objections, repeated as to every category, are contemptuous of a lawful order
16 of court, which is what a subpoena is.

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18 Dated: December 13, 2025

LYSAGHT LAW GROUP LLP

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20 By: /s/ *Natasha Riggs*
21 Brian C. Lysaght

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22 Attorneys for Matthew Barkohanai, Trustee
23 of The Second Amended and Restated
24 George Saadian Revocable Living Trust, as
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