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9 Attorneys for Respondent Matthew
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)

**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**

(Separate Statement Filed Concurrently)

Hearing Dated Reserved with Dept. 9

Hearing Date: August 27, 2026

Time: 9:30 a.m.

Dept.: 9

1 TO BOBBY B. SAADIAN AND HIS ATTORNEYS AND TO ALL
2 INTERESTED PARTIES:

3 PLEASE TAKE NOTICE that on August 27, 2026, at 9:30 a.m. in Department 9 of
4 the above-referenced court located at 111 N. Hill Street, Los Angeles, California 90012,
5 respondent Matthew Barkohanai, Trustee of The Second Amended and Restated George
6 Saadian Revocable Living Trust (“Trustee”) will move the Court for an order compelling
7 Bobby B. Saadian (“Bobby” or “Deponent”) to comply with the subpoena for deposition,
8 order attend Bobby to attend a deposition and testify and produce all documents requested
9 in Demand No. 1 on a date to be determined by this Court or by counsel for movant.¹
10 Bobby has refused, and continues to refuse, to comply with a deposition subpoena, appear
11 for deposition and produce the requested documents as demonstrated in the Declarations
12 of Brian C. Lysaght and Natasha Riggs and the accompanying exhibits.

13 The Trustee also moves for an order that Bobby pay the moving party the sum of
14 \$500 in contempt sanctions under Code of Civ. Proc. Section 1992 and reasonable costs
15 and attorney’s fees incurred by the moving party in connection with this proceeding in the
16 amount of \$4,410.00 under Code of Civ. Proc. Sections 2020.240; 2023.020; 2023.030;
17 2025.480, for a total sanctions amount of \$4,910.00

18 This Motion is made on the grounds that the deposition is relevant to the subject
19 matter of this action, and that Bobby’s refusal to be deposed and produce documents is
20 without sufficient justification. (Code of Civ. Proc. §§ 2017.010; 2019.010(a); 2020.310;
21 2020.510; 2025.480; Probate Code § 1000.) The Trustee has made good faith attempts at
22 informal resolution of the issues presented by this motion as set forth in the attached meet
23 and confer declarations pursuant to Section 2016.040. The witness is an experienced
24 attorney who is knowledgeable about the consequences of failure to comply with a
25 subpoena. An order of contempt, award of sanctions, attorneys’ fees and costs against the
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27 ¹ Due to the commonality of Bobby Saadian’s last name with his cousin Petitioner Jonah
28 Saadian, the settlor and others, those persons are referred to by their first name. No
disrespect is intended.

1 witness for his refusal to be deposed is justified. (Code Civ. Proc. §§ 2023.020; 2025.430,
2 2025. 440, 2020.240; 2023.020.)

3 This Motion is based on this notice, the points and authorities set forth below, the
4 attached Declarations of Brian C. Lysaght, Natasha Riggs, and Matthew Barkohanai,
5 Exhibits A-I, the accompanying Separate Statement, oral argument, and the files and
6 records of this action.

7
8 Dated: December 13, 2025

LYSAGHT LAW GROUP LLP

9
10 By: /s/ *Natasha Riggs*

11 Brian C. Lysaght

Natasha Riggs

12 Attorneys for Matthew Barkohanai, Trustee
13 of The Second Amended and Restated
14 George Saadian Revocable Living Trust, as
15 amended and restated
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 By this motion, Matthew Barkohanai, trustee of The Second Amended and
4 Restated George Saadian Revocable Living Trust seeks an order compelling nonparty
5 witness Bobby B. Saadian to appear and testify at a deposition and produce the requested
6 documents in compliance with a valid and properly served subpoena.

7 This motion is necessary because the witness Bobby refused to appear for his
8 properly noticed deposition on November 7, 2025. (See Exhibits A, B, E.) The subpoena
9 was issued on October 9 and personally served on the witness a few days later, on October
10 12, 2025. (Exhibit A, C.)

11 On October 31, 2025, the witness served written objections stating that
12 “Responding Party is unavailable on that date.” (Exhibit D.) The witness further justified
13 his failure to appear by stating he has “no knowledge relevant to the dispute”. That is not
14 valid basis for refusing to testify and produce. He also objected on the grounds that the
15 Trustee has access to information from Petitioner Jonah and the Trustee, rendering
16 Bobby’s deposition unnecessary. That is not an excuse recognized in California law
17 either. A witness cannot refuse to comply with a subpoena by stating he has no
18 information.

19 **II. BACKGROUND**

20 **A. Removal Petition**

21 Beneficiary Jonah has filed a petition to remove and surcharge the Trustee
22 Matthew Barkohanai for alleged transgressions in the administration of the trust. The
23 other two beneficiaries are the estate of the settlor’s mother and the settlor’s surviving
24 girlfriend/partner, neither of whom has joined in the petition.

25 The Trustee is entitled to the discovery at issue because of written and verbal
26 threats the witness has made against the Trustee, including financing litigation by Jonah,
27 as well as by Jonah’s brother, against the Trustee. (Exhibits H, I.) Barkohanai is also the
28

1 trustee of separate trusts in which Jonah and Brandon are the sole beneficiaries (the
2 related cases.)

3 Jonah and his brother Brandon are unhappy with the terms of the trust. They are
4 represented by the same attorneys. Jonah is unhappy that he was not selected as trustee
5 and was not given a larger beneficiary percentage of the trust. Brandon is upset that his
6 father disinherited him and did not name him as a successor trustee.

7 The Trustee's administration of this complex trust has been exemplary. The trust
8 held multiple real properties located in California, Nevada and Israel, as well as numerous
9 entities and valuable personal property which Jonah and Brandon refuse to turn over. The
10 Trustee has now sold five of the multi-million real properties resulting in net income to
11 the trust and large cash distributions to the beneficiaries. Jonah's Petition demonstrates an
12 intent to harass the Trustee as well as a fundamental misunderstanding of tax rules and
13 misrepresents tax consequences of the sale of trust assets.

14 The Trustee has successfully resolved at least ten lawsuits by third parties
15 involving the trust and its assets. Jonah has filed several petitions causing unnecessary
16 fees and expenses for the trust. For example, he objected to the profitable sale of one of
17 the real properties tying up the property in litigation and leading to the failure of escrow.
18 Jonah desires to use trust assets to purchase that property but has for years failed to come
19 up with a proposal acceptable to the other beneficiaries.

20 **B. Third Party Witness Bobby Saadian**

21 Bobby Saadian is another of the parties' cousins. He is a trial attorney and real
22 estate investor. In writing, he has demonstrated knowledge of Jonah and Brandon's
23 personal disputes with the Trustee. (Exhibit H.) He has threatened to pursue and finance
24 litigation brought by himself, Jonah and Brandon against the Trustee. (Exhibit I.) His
25 threats demonstrate animosity towards the Trustee apparently arising out of an unrelated
26 real estate dispute. Given those threats, the existence and extent of Bobby's involvement
27 in efforts to remove and surcharge the Trustee and the reasons behind doing so are
28 relevant to the motives behind the petition and the Trustee's defense.

III. RELEVANT PROCEDURAL HISTORY

A valid subpoena for the deposition testimony and production of business records of third party witness Bobby Saadian was issued on October 9, 2025. (Exhibit A.) The subpoena and notice of deposition was personally served on the witness on October 12, 2025. (Exhibit C.) The date and time for the deposition was November 7, 2025. The location was 8 miles from Bobby’s residence. (Riggs Declaration, ¶ 2.)

After Bobby was served, counsel for Bobby contacted the Trustee’s counsel. (Lysaght Declaration, ¶ 2.) Bobby’s counsel did not state Bobby was unavailable on the noticed date. (Id.) Instead, he stated that he would try to convince Bobby to appear. (Id.) He asked if Bobby could be appear on that date remotely. (Id.) The Trustee’s counsel confirmed that the Bobby had to appear in person because the deposition was going to be videotaped. (Id., Exhibit G.)

Ten days later, Bobby served written objections to the subpoena. (Exhibit D.) He did not show up on the scheduled date, has not produced any documents, and has failed to respond to requests to reschedule the deposition.

IV. BOBBY SAADIAN’S DEPOSITION AND THE REQUESTED DOCUMENTS ARE RELEVANT TO PETITIONER JONAH SAADIAN’S MOTIVES AND REASONS FOR SEEKING TO REMOVE THE TRUSTEE

The rules and procedures relating to discovery in civil actions, including those set forth in the Civil Discovery Act, are equally applicable to probate actions. (See Probate Code § 1000.) The basic purpose of all discovery is to take the “game” element out of case preparation by enabling parties to obtain the evidence necessary to evaluate and resolve their dispute beforehand. (*Emerson Electric Co. v. Superior Court* (1997) 16 Cal.4th 1101, 1107.) Each party has a presumptive right to inquire about any matter which – based on reason, logic and common sense – might (1) be admissible, (2) lead to admissible evidence, or (3) reasonably assist that party in evaluating the case, preparing for trial and/or facilitating resolution. (See Code Civ. Proc. § 2017.010; *Williams v.*

1 *Superior Court* (2017) 3 Cal.5th 531, 557.) Courts construe the right to discovery
2 liberally to permit discovery whenever possible. (*Williams*, id at 541.)

3 In this case, Bobby has information regarding the Petition, including the motives
4 for bringing it, a valid and proper subject matter of discovery by the Trustee. He has
5 already demonstrated knowledge of the disputes in written and verbal threats to the
6 Trustee. (Exhibits H, I.) He has threatened to finance the petition and disrupt the orderly
7 administration of the trust. The witness has an incentive to do so because of disputes he
8 has with the Trustee in an unrelated real estate matter.

9 **V. BOBBY SAADIAN DISOBEYED A VALID DEPOSITION SUBPOENA**
10 **AND MUST BE ORDERED TO APPEAR AT A DEPOSITION AND**
11 **TESTIFY**

12 “[D]iscovery from a nonparty may be obtained only by ‘deposition subpoena.’”
13 (*Unzipped Apparel, LLC v. Bader* (2007) 156 Cal.App.4th 123, 130; Code Civ. Proc. §
14 2025.010 (b).) Personal service of a deposition subpoena obligates the witness to appear
15 in any proceedings to enforce discovery and is effective to require personal attendance
16 and testimony of the witness. (Code Civ. Proc. § 2020.220(c).) If a nonparty disobeys a
17 deposition subpoena, the subpoenaing party may seek a court order pursuant to Code of
18 Civ. Proc. Section 1987.1 compelling the nonparty to comply with the subpoena within 60
19 days after completion of the deposition record. (Code Civ. Proc. § 2025.480(b);
20 *Unzipped Apparel*, id. at 127.)

21 Here, a subpoena which complied with California law was properly issued and
22 personally served. (Exhibit A.) (See Code Civ. Proc. §§ 2020.210(b); 2020.220(b).) The
23 subpoena was served well before the date of the deposition. (See Code Civ. Proc. §
24 2020.220(a).) The place of the deposition was about a 15-20 minute drive from the
25 witness’ residence. (Riggs Declaration, ¶ 2.) The start time was 1:00 p.m.

26 The witness served objections to the subpoena served on October 31, 2025.
27 (Exhibit D.) His objections included the statement that the date and time of the deposition
28 was unilaterally selected and he was “unavailable”. (Exhibit D.) Bobby did not file a

1 motion to quash the subpoena. He did not seek a protective order. The objection that he
2 was not available was not raised by his counsel during a pre-deposition call. (Lysaght
3 Declaration, ¶ 2.) The witness refuses to appear and testify. He refuses to produce any of
4 the requested documents.

5 **VI. AN AWARD OF CONTEMPT SANCTIONS, ATTORNEYS' FEES AND**
6 **COSTS AGAINST BOBBY SAADIAN IS JUSTIFIED**

7 The court may award monetary and contempt sanctions against nonparties and their
8 attorneys who flout the discovery process by ignoring subpoenas. Sanctions are
9 appropriate where a nonparty witness fails to appear. If a deponent on whom a deposition
10 subpoena has been served fails to attend a deposition, the court may impose on the
11 deponent sanctions described in Code of Civil Procedure Section 2020.240. (Code Civ.
12 Proc. §2025.440(b).) Those sanctions include contempt, as well as a civil action for
13 damages, with a minimum forfeiture of \$500.00. (Code Civ. Proc. §§ 1992; 2020.240.)

14 The Code provides for contempt sanctions against nonparties who have been
15 personally served with deposition subpoenas. Section 2025.440 states that if a deponent
16 “fails to attend a deposition,” the Court may hold that witness in contempt. These
17 sanctions are available even absent “a prior order of court directing compliance by the
18 witness.” (C.C.P. § 2020.240.) Code of Civil Procedure Section 2020.240 provides:

19 A deponent who disobeys a deposition subpoena in any manner described in
20 subdivision (c) of Section 2020.220 may be punished for contempt under
21 Chapter 7 (commencing with Section 2023.010) without the necessity of a
22 prior order of court directing compliance by the witness. The deponent is
also subject to the forfeiture and the payment of damages set forth in
Section 1992.

23 Here the witness is an experienced attorney who understands the consequences of
24 failure to comply with subpoena for deposition testimony. Yet he persists in misusing the
25 discovery process. (See Code of Civ. Proc. § 2023.010 (d), (f).) The Trustee requests an
26 award of sanctions in the amount of \$500 under Section 1992 against Bobby Saadian for
27 his unjustified refusal to comply with the subpoena and \$4,410 in fees and costs for
28 having to bring this motion.

1 **VII. CONCLUSION**

2 The Trustee respectfully requests that the Court order Bobby Saadian to appear and
3 testify at a deposition on a date set by this Court or by counsel for the Trustee and to
4 produce all documents responsive to Demand No. 1.

5 The witness, the founder of a large law firm, knows that inconvenience or not
6 wanting to be bothered with a deposition is not an excuse for a not appearing after a valid
7 subpoena was properly and timely served. Contempt sanctions in the amount of \$500 and
8 attorneys' fees and costs in having to bring this motion in the amount of \$4,410 should
9 also be awarded against the witness.

10
11 Dated: December 13, 2025

LYSAGHT LAW GROUP LLP

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13 By: /s/ *Natasha Riggs*

14 Brian C. Lysaght

Natasha Riggs

15 Attorneys for Matthew Barkohanai, Trustee
16 of The Second Amended and Restated
17 George Saadian Revocable Living Trust, as
18 amended and restated
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DECLARATION OF NATASHA RIGGS

I, Natasha Riggs, declare and state as follows.

1. I am an attorney licensed to practice law in the state of California and other jurisdictions. I am one of the attorneys for respondent Matthew Barkohanai, Trustee of The Second Amended and Restated George Saadian Revocable Living Trust in this case. I make this declaration on personal knowledge in support of the Trustee's Motion seeking an order compelling third party Bobby B. Saadian to comply with a subpoena and appear at a deposition and for an award of \$4,910 in sanctions for his failure to comply and for having to bring this motion.

Subpoena and Meet and Confer Attempt

2. Attached hereto as Exhibit A is a true and correct copy of the Deposition Subpoena for Personal Appearance and production of Things which I issued on October 9, 2025. The deposition was set for November 7, 2025 at 1:00 p.m. at my office address in Santa Monica, approximately 8 miles from Bobby Saadian's residence in Pacific Palisades which is about a 15-20 minute drive from the deposition location.

3. Attached hereto as Exhibit B is a true and correct copy of the Notice of Bobby Saadian's deposition dated October 9, 2025.

4. Attached hereto as Exhibit C is a true and correct copy of the proof of service of the subpoena on Bobby Saadian. Bobby was served on October 12, 2025.

5. Attached hereto as Exhibit D is a true and correct copy Bobby Saadian's Objections to Subpoena, Notice of Deposition and Request to Produce at Deposition dated October 31, 2025.

6. Attached here as Exhibit E is a true and correct copy of pages 1-8 from the court reporter's November 7, 2025 Certificate of Non Appearance of Bobby Saadian.

7. Attached hereto as Exhibit F is a true and correct copy of my email sent to John Lucas, general counsel of Bobby Saadian's law firm on December 1, 2025. In that email, I again requesting a meet and confer about Bobby Saadian's refusal to appear at a deposition. As of the filing of this motion, I have not heard back. In Exhibit F, below my

1 email is a true and correct copy of Brian Lysaght's November 10, 2025 email to Mr.
2 Lucas on which I was copied. Mr. Lysaght discussed Bobby's failure to appear, their pre-
3 deposition phone call and necessity for a motion to compel compliance with the subpoena.

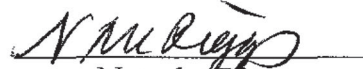
4 Background and Experience

5 8. I received my J.D. from Northwestern University School of Law in 1990.
6 My experience includes a multi-day bench trial in a closed courtroom involving a business
7 dispute, a \$1.4 million judgment for the plaintiff which I also successfully in the Court of
8 Appeal; two policy limits settlements on behalf of the insureds; a costs of defense
9 settlement with an insurance company involving a disability access case which for which I
10 obtained summary judgment; dismissal of a complaint in breach of contract case on behalf
11 of the defendant based on claim and issue preclusion; and dismissal of an employment
12 law case brought by four plaintiffs on behalf of the defendants. In 2023, in an order
13 awarding my client attorneys' fees, a Los Angeles Superior Court judge found that based
14 on the Laffee Index my hourly rate of \$945 during 2018-2023 was reasonable.

15 9. I am familiar with hourly rates of attorneys in Los Angeles County with
16 background and experience similar to mine. I believe that my rate of \$400 per hour in this
17 case is reasonable.

18 10. I spent over 5.0 hours working on this motion, including drafting and legal
19 research. The Trustee's fee request for my time of 5.00 hours is \$2,000.00. Motion filing
20 fees of \$60.00 have been incurred. This does not include the attorney service e-filing
21 costs incurred for the filing of the moving and reply papers. In addition, the fee incurred
22 for personal service of this motion on Bobby Saadian is \$250.00. The requested sanctions
23 do not include the cost of the Certificate of Non Appearance because we have not yet
24 received the invoice

25 I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true incorrect, and that this declaration was executed on December 13, 2025
27 at Los Angeles, California.

28 
Natasha Riggs

DECLARATION OF BRIAN C. LYSAGHT

I, Brian C. Lysaght, declare and state as follows.

1. I am an attorney licensed to practice law in the state of California and other jurisdictions. I am chief counsel for respondent Matthew Barkohanai, Trustee of The Second Amended and Restated George Saadian Revocable Living Trust in this case. I make this declaration on personal knowledge in support of the Trustee's Motion seeking an order compelling third party Bobby B. Saadian to comply with a subpoena and appear at a deposition and for an award of \$4,910.00 in sanctions for his failure to comply and for having to bring this motion.

2. On October 21, 2025, I spoke with John Lucas, general counsel for the Wilshire Law Firm of which Bobby Saadian is a partner. Mr. Lucas stated that he was acting as the legal representative of Saadian. Mr. Lucas did not advise me that Saadian was unavailable on the scheduled date. He stated that Saadian wanted his deposition after the party depositions. I responded that due to scheduling issues that was not possible. Mr. Lucas stated that Saadian had nothing to say about the trust litigation although we briefly discussed Saadian's text messages to the Trustee about the subject. I advised him that a deposition cannot be avoided based on the witness' unsworn denials of relevant information. Mr. Lucas stated he would "try" to get Saadian to appear for his deposition. He inquired about Mr. Saadian appearing remotely and remarked that it may be easier to get Saadian to appear remotely. Shortly after the phone call, I sent Mr. Lucas an email informing him that Saadian would have to appear in person because his deposition was going to be videotaped. A true and correct copy of that email dated October 21, 2025 is appended as Exhibit G.

3. Saadian did not appear on the scheduled date for his deposition. I phoned Mr. Lucas' cell phone and left a message asking about the non-appearance. I also phoned the Wilshire Law firm and was told Mr. Lucas was not available so I left another message on his firm voicemail. Later that afternoon, Mr. Lucas sent me an email stating that he "assumed" we "will be able to obtain seek whatever it is we are seeking from the parties".

1 That is not a valid basis for refusing to appear. A true and correct copy of that email is on
2 page 2 of Exhibit F hereto and a true and correct copy of my response is on page 1.

3 4. My rate of \$700 per hour in this case is reasonable in light of my seniority
4 and experience. The Laffee Index of rates in the Southern California region justifies an
5 hourly rate of over \$1,000 for me.

6 5. After graduating from Johns Hopkins University with an MLA I received
7 my J.D. from the University of California at Davis in 1974. After law school I clerked for
8 Justice Stanley Mosk for the California Supreme Court's 1974-1975 term after which I
9 became a litigation associate at O'Melveny and Myers in Los Angeles. Thereafter I was a
10 federal prosecutor with the Antitrust Division of the United States Department of Justice.
11 In 1985 I formed O'Neill, Lysaght & Sun LLP. In 2003 I accepted a position as a partner
12 and head of Southern California Litigation at the international firm of DLA Piper. I
13 formed my present firm Lysaght Law Group LLP in 2011.

14 6. I have been qualified, deposed and testified as an expert witness on the
15 subject of federal jury trial practice and procedure. I have had extensive jury and court
16 trial and appellate experience in state and federal courts in various jurisdictions including
17 New York, Washington, California, Colorado, Nevada and New Mexico. In 2011 I
18 became licensed as a solicitor with a practicing certificate in England and Wales.

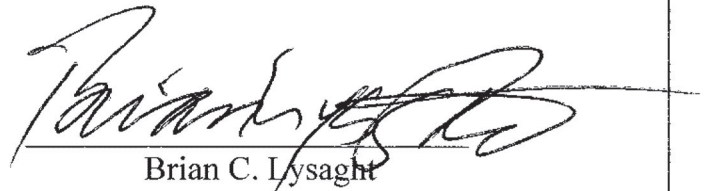
19 7. I have served two terms on the Board of Directors of the Association of
20 Business Trial Lawyers and two terms as an appointed member of the Judicial
21 Nomination and Evaluation Commission ("JNE Commission"). I am currently serving a
22 three-year term as an appointed member of the federal Magistrate Merit Selection Panel,
23 which vets candidates and issues recommendations regarding potential United States
24 Magistrate Judges to the Chief Judge of the Central District of California.

25 8. I believe that my experience justifies my fee rate of \$400 and that of my
26 partner Natasha Riggs in this case. The Laffee Index of rates in the Southern California
27 region justifies an hourly rate of over \$1,000 for me.

28 9. I have spent over 1.00 hours in connection with the drafting and preparation

1 of this motion, declaration and separate statement. I reasonably anticipate spending 0.40
2 hours reviewing Bobby Saadian's opposition papers, 0.60 hours preparing a reply and
3 1.00 hour at the hearing on this motion. Thus the fee sanction against Bobby Saadian
4 includes \$2,100 for my time (3 hours x \$700).

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true incorrect, and that this declaration was executed on December 13, 2025
7 at Los Angeles, California.

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10 Brian C. Lysaght
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DECLARATION OF MATTHEW BARKOHANAI

I, Matthew Barkohanai, declare and state as follows.

1. I am the Trustee of The Second Amended and Restated George Saadian Revocable Living Trust. I make this declaration on personal knowledge in support of the Motion seeking an order compelling third party Bobby B. Saadian to comply with a subpoena and appear at a deposition and for an award of \$4,410.00 in attorneys' fees and costs and contempt sanctions in the amount of \$500.

2. Attached hereto as Exhibit H are true and correct copies of text messages from Bobby Saadian to me sent on November 11, 2024. Bobby states in part:

"I am aware of how you are abusing Jonah and Brandon
The Last thing you want is for me to join them in a lawsuit against you."

3. Attached here as Exhibit I is are true and correct copies of text messages from Bobby Saadian to me sent on November 14, 2024. Saadian states in part that he "is going to fund Brandon and Jonah's lawsuit against you as well".

I declare under penalty of perjury under the laws of the State of California that the foregoing is true incorrect, and that this declaration was executed on December 13, 2025 at Los Angeles, California.

Signed by:

MATTHEW BARKOHANAI

D6EA287C9A5244B...

Matthew Barkohanai

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): LYSAGHT LAW GROUP LLP Brian C. Lysaght (SBN 61965); Natasha Riggs (SBN 150889) 401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401 TELEPHONE NO.: (424) 252-4747 FAX NO. (Optional): E-MAIL ADDRESS (Optional): nriggs@lysaghtlegal.com; blysaght@lysaghtlegal.com ATTORNEY FOR (Name): Matt Barkohanai, Trustee	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/ PETITIONER: JONAH SAADIAN DEFENDANT/ RESPONDENT: Matt Barkohanai, as Trustee of the Second Amended and Restated	
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS	CASE NUMBER: 23STPB12471

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Bobby Babak Saadian, Wilshire Law Firm, PLC, 3055 Wilshire Blvd Fl 12, Los Angeles, CA 90010; Tel: 213-381-9988

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: November 7, 2025 Time: 1:00 p.m. Address: 401 Wilshire Blvd., 12th Floor, Santa Monica CA 90401

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
 - b. ☒ You are ordered to produce the documents and things described in item 3.
 - c. ☒ This deposition will be recorded stenographically ☒ through the instant visual display of testimony and by ☒ audiotape ☒ videotape.
 - d. ☒ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows:
 See Attachment 3.
☒ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
☐ Continued on Attachment 4.
5. **IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**
6. *At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.*

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: October 9, 2025

Natasha Riggs

(TYPE OR PRINT NAME)

▶ */s/ NM Riggs*

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Matt Barkohanai, Trustee

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: JONAH SAADIAN	CASE NUMBER: 23STPB12471
DEFENDANT/RESPONDENT: Matt Barkohanai, as Trustee of the Second Amended	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

1. I served this *Deposition Subpoena for Personal Appearance and Production of Documents and Things* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (*check one*):

(1) ☐ were paid. Amount:\$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (*specify*): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional copier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

In the matter of The Second Amended and Restated George Saadian Revocable Living Trust, as amended and restated, L.A.S.C. Case No. 2S3TPB12471

ATTACHMENT 3

DOCUMENTS TO BE PRODUCED:

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").

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.

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 Matthew Barkohanai's administration of the GS TRUST.

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.

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.

ATTACHMENT 3 - continued

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, 2025 to the present.

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.

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.

8. 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 rents paid to Branmark Group for the residential use of the Evelyn Property, from February 1, 2021 to the present.

9. 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 the Jonah Saadian, relating to Jonah Saadian’s efforts to name Brandon A. Saadian a beneficiary of the GS TRUST.

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.

ATTACHMENT 3 - continued

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. 25STPB12471, including but not limited to emails, text messages, copies of confirmations of payments whether by check, draft, Zelle, wire, ACH or Venmo.

Dated: October 9, 2025

LYSAGHT LAW GROUP LLP

By: /s/ *Natasha Riggs*

Brian C. Lysaght

Natasha Riggs

Attorneys for Matthew Barkohanai, Trustee of
The Second Amended and Restated George
Saadian Revocable Living Trust, as amended and
restated

EXHIBIT B

1 LYSAGHT LAW GROUP LLP
2 Brian C. Lysaght (SBN 61965)
3 Natasha Riggs (SBN 150889)
4 401 Wilshire Blvd., 12th Floor
5 Santa Monica, CA 90401
6 Tel.: 424-252-4747
7 blysaght@lysaghtlegal.com
8 nriggs@lysaghtlegal.com

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

11 In the matter of:

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

Case No. 23STPB12471

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

**TRUSTEE AND RESPONDENT
MATTHEW BARKOHANAI'S NOTICE OF
DEPOSITION OF BOBBY BABAK
SAADIAN AND REQUEST FOR
PRODUCTION OF DOCUMENTS AT
DEPOSITION**

Date: November 7, 2025

Time: 1:00 p.m.

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

Tel: 424-252-4747

1 TO PETITIONER JONAH SAADIAN AND HIS ATTORNEYS OF RECORD AND TO
2 ALL OTHER INTERESTED PARTIES:

3 PLEASE TAKE NOTICE that Respondent Matthew Barkohanai, Trustee of The Second
4 Amended and Restated George Saadian Revocable Living Trust, as amended and restated
5 (“TRUSTEE”) by and through his attorneys of record, will take the deposition, upon oral
6 examination, under oath, of Bobby Babak Saadian (“SAADIAN”) whose last known addresses
7 are as follows:

8 Home: [SERVICE ADDRESS REDACTED]

9 Business: Wilshire Law Firm, PLC, 3055 Wilshire Blvd Fl 12, Los Angeles, CA
10 90010- 1176; Phone: 213-381-9988.

11 This deposition will commence at 1:00 p.m. on November 7, 2025 at 401 Wilshire Blvd.,
12 12th Floor, Santa Monica, California 90401 and may continue day to day until completed. Said
13 deposition will be taken before any notary public authorized to administer oaths in the State of
14 California who will be present at the specified date, time and place.

15 NOTICE IS GIVEN that deposing party, TRUSTEE, will record the deposition testimony
16 by videotape and audiotape and will record the testimony by stenographic method through the
17 instant visual display of the testimony or other means.

18 NOTICE IS FURTHER GIVEN that deposing party, TRUSTEE, intends on using said
19 written and audio recordings of the deposition testimony at trial. Expert witnesses may also rely
20 on said recordings and testimony transcripts at trial pursuant to Code of Civil Procedure §
21 2025.010 et seq.

22 PLEASE TAKE FURTHER NOTICE that pursuant to Code of Civil Procedure §
23 2025.220(a)(4), SAADIAN is requested to bring the documents, records and items listed below
24 which are also described in Attachment 3 to the Subpoena accompanying this Notice.

25 PLEASE TAKE FUTHER NOTICE that if the deponent SAADIAN or any party objects
26 to the demand for inspection or any item contained therein, the response shall (i) identify with
27 particularity any document, record or tangible item falling within any category in the demand to
28

1 which an objection is made; and (ii) specifically set forth any and all grounds for the objection.
2 Said objection must be served on counsel for the TRUSTEE at least three days prior to the
3 deposition. (C.C.P. § 2025.410(a).) If any objection is made three calendar days before the
4 deposition date, the objecting party shall personally serve counsel for the TRUSTEE with said
5 objection. (C.C.P. § 2025.410(b).)

6 **DOCUMENTS TO BE PRODUCED:**

7 1. Printed copies of all communications, including but not limited to text messages,
8 emails, and postings on any social media sites such as Instagram and WhatsApp, between you and
9 any person, including but not limited to Jonah Saadian, relating to Jonah Saadian's Petition to
10 Remove or Suspend Matthew Barkohanai as trustee of The Second Amended and Restated
11 George Saadian Revocable Living Trust, as amended and restated ("GS TRUST").

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

16 3. Printed copies of all communications, including but not limited to text messages,
17 emails, and postings on any social media sites such as Instagram and WhatsApp, between you and
18 any person, including but not limited to Jonah Saadian, relating to Matthew Barkohanai's
19 administration of the GS TRUST.

20 3 Printed copies of all communications, including but not limited to text messages,
21 emails, and postings on any social media sites such as Instagram and WhatsApp, between you and
22 any person, including but not limited to Jonah Saadian, relating to the GS TRUST.

23 4. 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 and
25 any person, including but not limited to Jonah Saadian, relating to the real property located at
26 12235 Beach Blvd in Stanton California 90680 (the "Beach Property"), from February 1, 2021 to
27 the present.

1 5. Printed copies of all communications, including but not limited to text messages,
2 emails, and postings on any social media sites such as Instagram and WhatsApp, between you and
3 any person, including but not limited to Jonah Saadian, relating to the real property located at 405
4 Evelyn Place, Beverly Hills, California 90210 (the “Evelyn Property”), from February 1, 2025 to
5 the present.

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

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

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

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

23 10. 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 and
25 any person, including but not limited to Jonah Saadian relating to distributions from the GS
26 TRUST, from February 1, 2021 to the present.

1 11. All documents relating to Jonah Saadian's legal costs, including attorney's fees in
2 the Los Angeles Superior Court probate case *In the matter of The Second Amended and Restated*
3 *George Saadian Revocable Living Trust, as amended and restated*, L.A.S.C. Case No.
4 23STPB12471, including but not limited to emails, text messages, copies of confirmations of
5 payments whether by check, draft, Zelle, wire, ACH or Venmo.

6
7 Dated: October 9, 2025

LYSAGHT LAW GROUP LLP

8
9 By: /s/ *Natasha Riggs*

Brian C. Lysaght

Natasha Riggs

10 Attorneys for Matthew Barkohanai, Trustee of
11 The Second Amended and Restated George
12 Saadian Revocable Living Trust, as amended and
13 restated
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EXHIBIT C

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER:
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

1. I served this *Deposition Subpoena for Personal Appearance and Production of Documents and Things* by personally delivering a copy to the person served as follows:

a. Person served (name): Bobby Babak Saadian

b. Address where served:

[SERVICE ADDRESS REDACTED]

c. Date of delivery: 10/13/25

d. Time of delivery: 6:08p

e. Witness fees and mileage both ways (check one):

(1) ☐ were paid. Amount:\$ _____

(2) ☒ were not paid.

(3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify):\$ _____

f. Fee for service:\$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☒ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional photocopier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

Adam Jensen
3042 Paula Dr.
Santa Monica, Ca. 90405
310 365 5943
L.A. Reg. #2013181996

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/13/25

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

**PROOF OF SERVICE
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

For your protection and privacy, please press the Clear
This Form button after you have printed the form.

Print this form

Save this form

Clear this form

I, Adam Jensen, do hereby state and declare as follows:

1. I am over the age of eighteen, a resident of the State of California and am not a party in the Los Angeles County Superior Court action entitled: Jonah Saadian v. Matt Barkohanai, 22STPB12471

2. I am a Los Angeles County Registered Process Server # 2013181996 and am employed by Jensen Process Serving at 3042 Paula Dr, Santa Monica, CA 90405, 310-365-5943.

3. On 10/09/25 I was contracted by Lysaght Law Group, LLP for service of Deposition Subpoena for Personal Appearance and Production of Documents and Things at Bobby Babak Saadians work address of 3055 Wilshire Blvd, 12th floor Los Angeles, Ca. 90010.

4. Unsuccessful service attempt was made at the business address on 10/10/25 at 10:58a. The unit was empty. The Wilshire Law Firm, PLC has moved to 660 S. Figueroa, Sky Lobby, Los Angeles, Ca. 90017.

5. An unsuccessful service attempt was also made at residence at [REDACTED] [ADDRESS REDACTED] 10/11/25 at 12:32p. This is a security community entrance. I additionally need a security escort to the residence. I spoke to a female through the intercom at the residences' gate. She informed me to come back the following evening and he would be there.

6. A successful attempt was made at the residence address on 10/12/25 at 6:08p. I went through security at the community gate along with getting a security escort to the residence. I again spoke to a female through the intercom at the residence gate. She told me to leave the papers on top of the call box. I informed her I would prefer to hand them directly to a person. A male voice then said to just leave it on top of the intercom. I said there is already a package on the other side of the fence, would they prefer me to put it there. the male voice responded no. I then asked if I was speaking with Bobby? He responded yes. Just leave it on top of the intercom and get off my property. I then left it on top of the intercom and left with security.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/13/25



EXHIBIT D

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
--	---

EXHIBIT E

In the Los Angeles, CA Superior Court Matter of

**IN RE:
THE SECOND AMENDED AND RESTATED
GEORGE SAADIAN REVOCABLE LIVING TRUST**

Case No.
23STPB12471

Certificate of Nonappearance for
BOBBY BABAK SAADIAN

Taken on
NOVEMBER 7, 2025

Reported By:
MELISSA WALI, CSR NO. 13514



(888) 740-1100
www.barrettreporting.com

In the matter of:

The Second Amended and Restated

George Saadian Revocable Living

Trust, as amended and restated.

2

A P P E A R A N C E S:

FOR THE PETITIONER (Not Present):

WILSHIRE LAW FIRM, PLC

BY: BOBBY BABAK SAADIAN

Attorney at Law

3055 wilshire Boulevard

Floor 12

Los Angeles, California 90010

(213) 381-9988

bobby@wilshirelawfirm.com

FOR THE RESPONDENT:

LYSAGHT LAW GROUP LLP

BY: BRIAN C. LYSAGHT

NATASHA RIGGS

Attorneys at Law

401 wilshire Boulevard

12th Floor

Santa Monica, California 90401

(424) 252-4747

blysaght@lysaghtlegal.com

ALSO PRESENT:

MATT BARKOHANAI, Respondent

I N D E X

CERTIFICATE OF NONAPPEARANCE
AND STATEMENT ON THE RECORD

PAGE

By Mr. Lysaght

5

E X H I B I T S

NUMBER

DESCRIPTION

PAGE

Exhibit 1

Respondent's Deposition Subpoena
for Personal Appearance and
Attachment 3

6

Exhibit 2

Proof of Service of Deposition
Subpoena for Personal Appearance
and Production of Documents and
Things

6

Exhibit 3

Trustee and Respondent
Matthew Barkohanai's Notice of
Deposition of Bobby Babak Saadian
and Request for Production of
Documents at Deposition

6

1 SANTA MONICA, CALIFORNIA; FRIDAY, NOVEMBER 7, 2025

2 1:30 P.M.

3 -oOo-

4 THE REPORTER: My name is Melissa Wali,
5 California certified shorthand reporter No. 13514.

6 I, Melissa Wali, California certified shorthand
7 Reporter, No. 13514, hereby certify that I am the
8 certified shorthand reporter who appeared at
9 401 Wilshire Boulevard, 12th Floor, Santa Monica,
10 California, on FRIDAY, NOVEMBER 7, 2025, at 12:45 p.m.,
11 for attorney BRIAN C. LYSAGHT for the purpose of taking
12 the deposition of BOBBY BABAK SAADIAN on behalf of the
13 Respondent; that the Respondent's attorney, Ms. Riggs,
14 Matt Barkohanai, and myself waited until the hour of
15 1:30 p.m., and the deponent did not appear.

16 Respondent's attorney, BRIAN C. LYSAGHT, made the
17 following statement:

18 MR. LYSAGHT: My name is Brian Lysaght, and I am
19 the party who caused the subpoena to be served on
20 Mr. Bobby Babak Saadian and request for production of
21 documents.

22 I'd like to mark, as exhibit next in order, the
23 deposition subpoena for personal appearance and production
24 of documents and things that was directed to the deponent
25 to appear, and I'd like that marked as next in order.

1 (Exhibit 1 was marked for identification by the
2 court reporter and is attached hereto.)

3 MR. LYSAGHT: All right. And I'd like the
4 reporter, please, to mark, as next in order, a proof of
5 service of the deposition subpoena for personal appearance
6 and production of documents and things that was served on
7 Bobby Babak Saadian on October 12, 2025 by a registered
8 California process server, and I'd like the reporter to
9 mark that as next in order. It could be 1 and 2 if you
10 wish.

11 (Exhibit 2 was marked for identification by the
12 court reporter and is attached hereto.)

13 MR. LYSAGHT: And I'd like to mark, as exhibit
14 next in order, a notice of deposition of Bobby Babak
15 Saadian and request for production of documents at
16 deposition which was served on the witness and all parties
17 that were necessarily interested in the deposition. And
18 that will be Exhibit 3, I suppose.

19 (Exhibit 3 was marked for identification by the
20 court reporter and is attached hereto.)

21 MR. LYSAGHT: Now, let the record reflect that it
22 is now -- what time is it now?

23 THE REPORTER: 1:35.

24 MR. LYSAGHT: It is now 1:35 p.m. The deposition
25 was scheduled for 1:00 p.m. I have received a call from

1 the general counsel of the firm where the witness is
2 employed who inquired why we were taking the deposition
3 and that it should not be taken because Mr. Saadian knows
4 nothing.

5 And I responded, "That's why we're taking the
6 deposition, to find out."

7 I told him that we expected him to be here at
8 1:00 o'clock. It is now 1:35 p.m. There has been no
9 appearance by the witness. There has been no documents
10 produced by the witness or his counsel.

11 There were objections filed by the general
12 counsel who appears to be representing the witness and we
13 have those, but that did not excuse the witness'
14 appearance. He has not appeared here, and we will proceed
15 to take such steps as to compel his appearance and to
16 compel a production of documents.

17 And I guess we're off the record. I apologize
18 Mr. Videographer and Ms. Reporter.

19 -o0o-

20 (PROCEEDINGS WERE CONCLUDED AT 1:35 P.M.)

REPORTER'S CERTIFICATE

I, MELISSA WALI, CSR No. 13514, Certified
Shorthand Reporter, certify:

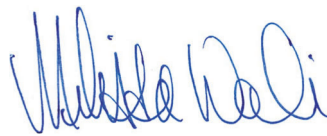
That the foregoing proceedings were taken at the
location, date, and time therein set forth, at which time,
the statements made were recorded stenographically by me
and were thereafter transcribed;

That the foregoing is a true and correct
transcript of my shorthand notes so taken.

I further certify that I am not a relative or
employee of any attorney of the parties, nor financially
interested in the action.

I declare under penalty of perjury under the laws
of California that the foregoing is true and correct.

Dated this 13th day of November, 2025.



MELISSA WALI, CSR No. 13514

EXHIBIT F



Natasha Riggs <nriggs@lysaghtlegal.com>

Bobby Saadian Deposition/Meet & Confer

1 message

Natasha Riggs <nriggs@lysaghtlegal.com>

Mon, Dec 1, 2025 at

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

Cc: BLysaght <blysaght@lysaghtlegal.com>

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 a 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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On Fri, Nov 7, 2025 at 13:59 John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

Brian,

I was surprised to get your voicemail. We made clear in our timely, valid objections to (1) the subpoena; (2) the deposition notice; and (3) the document requests that Mr. Saadian would not be appearing, and that he would not be producing documents because he does not possess responsive documents relevant to the trust dispute. We assume that you will be able to obtain whatever it is that you are seeking from discovery among the parties.

John

<image741908.png>

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

www.wilshirelawfirm.com

<image091547.png> <image361382.png> <image278084.png> <image583789.png>

<image032750.png>

[Scan or click here for my contact](#)

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<image328082.jpg>

Rate my services: How was your overall experience with me?

<image213136.png><image376411.png><image916817.png><image865820.png><image453473.png>

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EXHIBIT G

George Saadian Trust matter

1 message

Brian Lysaght <blysaght@lysaghtlegal.com>
To: John Lucas <john.lucas@wilshirelawfirm.com>
Cc: Natasha Riggs <nriggs@lysaghtlegal.com>

Tue, Oct 21, 2025 at 12:38 PM

John,
On further reflection, the deposition will need to be in person. We arranged for it to be videotaped. Our office is located near to Bobby Saadian's residence.

Best,
Brian Lysaght

On Monday, October 20, 2025, John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

Natasha, thanks for getting back to me. Late morning tomorrow should work for me. As for the phone issue, I dialed three times and it happened all three. Glad it's working for you all.



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: Monday, October 20, 2025 2:00 PM
To: John Lucas, Esq. <john.lucas@wilshirelawfirm.com>
Cc: Blysaght <blysaght@lysaghtlegal.com>
Subject: Re: George Saadian Trust matter

Good Afternoon John,
I'd be happy to speak with you. I can call tomorrow late morning.
Thank you for the information about our telephone number. However, we do not seem to be having any problems on our end.

Natasha Riggs, Esq.

Lysaght Law Group LLP
401 Wilshire Blvd., 12th Fl.
Santa Monica, CA 90401
Tel: 424.252.4747

On Oct 20, 2025, at 12:44 PM, John Lucas, Esq. <john.lucas@wilshirelawfirm.com> wrote:

Hi, Natasha. I'm the GC at Wilshire Law Firm and I have the depo notice and subpoena for Bobby Saadian. I was hoping to speak with you about that for a couple minutes. I tried the firm's number several times and was immediately kicked to "sorry, can't be completed as dialed." So I'd appreciate it if you could give me a ring. My cell is fine. 310-402-4388. Thanks.



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

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EXHIBIT H

2:25



< 146



3 People >

Also, I had sent you a cease-and-desist and your interfering with my business. As you know, I have no business or contractual relationship with you.

If you cause any problems for me, Matthew, I will come after you and sue you personally

You have already damaged my family relationship with you. I'm very disappointed in your behavior.



Eliz, please talk to your son.

Jack, please knock some sense into this kid.

And one more thing for you, Matt I am aware of how you are abusing Jonah and Brandon

The last thing you want is for me to join them in a lawsuit against you



Jack Saadian

Hi Bobby just saw your text
Give me few minutes we can solve all the issues.
Love you .



Bobby Saadian

Matthew, if you cannot control yourself, my next step will be



iMessage



EXHIBIT I

