

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.: blysaght@lysaghtlegal.com
7 nriggs@lysaghtlegal.com

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9 Attorneys for Respondent Matthew Barkohanai,
10 Trustee of The Second Amended and Restated
11 George Saadian Revocable Living Trust

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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 Nos. 24STBP00592; 24STPB00604

(Assigned to Hon. Ruben Garcia, Dept. 244)

**TRUSTEE AND RESPONDENT
MATTHEW BARKOHANAI'S REPLY TO
OPPOSITION TO MOTION FOR ORDER
COMPELLING NON PARTY BOBBY B.
SAADIAN'S COMPLIANCE WITH
DEPOSITION SUBPOENA;
DECLARATIONS OF NATASHA RIGGS
AND BRIAN C. LYSAGHT; EXHIBIT J**

Hearing Date: August 27, 2026

Time: 9:30 a.m.

Dept.: 9

1 **I. INTRODUCTION**

2 This should be a straightforward motion. A nonparty witness, lawyer Bobby Saadian, was
3 personally served with a valid deposition subpoena commanding him to appear and testify. He
4 did not move to quash the subpoena or seek a protective order. He simply refused to appear. His
5 Opposition now asks the Court to excuse that refusal principally because the witness claims he
6 has nothing relevant to say, is too busy to sit for a deposition, and should be permitted to
7 substitute his own declaration for examination under oath.

8 Discovery does not work that way. A subpoenaed witness cannot decide for himself what
9 he knows, declare his own knowledge irrelevant, and thereby prevent the examining party from
10 asking the questions.

11 That is particularly true here because the witness's own admitted statements establish
12 ample grounds for examination. Bobby told the Trustee Matthew Barkohanai that he knew how
13 the Trustee was supposedly "abusing Jonah and Brandon," threatened to "join them in a lawsuit
14 against you," and then stated that he was "going to fund Brandon and Jonah's lawsuit against you
15 as well." (Motion, Barkohanai Decl., ¶¶ 2-3; Exhibits H, I; see Bobby Opposition Decl., ¶¶ 6, 8.)
16 The referenced litigation is an action by beneficiary Jonah Saadian to remove the Trustee and
17 impose surcharges against him. Respondent/moving party Trustee is entitled to ask Bobby what
18 he knew, what Jonah Saadian and Brandon Saadian told him, why he threatened to join or finance
19 their litigation, whether he took any steps to do so, and what communications he had with Jonah,
20 Brandon and any other persons relating to the Trustee, his administration of the trust and the
21 removal petition.

22 The witness's new explanation only confirms rather than contests the need for his
23 deposition. He now admits making the statements but says they were merely an "empty threat"
24 prompted principally by frustration arising from a separate real-estate dispute with the Trustee
25 acting in his individual capacity. (Bobby Decl., ¶¶ 6, 8-10.) That is testimony to be examined,
26 not a reason to prevent examination. His explanation raises questions concerning the nature of
27 that still-unresolved dispute, the resulting hostility toward the Trustee, and whether that hostility
28 motivated his threatened participation litigation with Jonah and Brandon.

1 The witness's written objections fare no better. Bobby asserted three threshold objections
2 to the deposition itself: first, that he knew nothing relevant and the deposition therefore
3 constituted harassment; second, that the Trustee could obtain whatever information he needed
4 from the parties; and third, that the deposition date had been selected unilaterally and the witness
5 was unavailable. None justified refusal to appear. The first would permit the witness to himself
6 decide the relevance of his own testimony. The second permits him to decide that another
7 witness's testimony is an adequate substitute for his own. The third, at most, called for
8 rescheduling which Bobby has refused.

9 Remarkably the Opposition criticizes the Trustee for cooperating with the witness's
10 lawyer by reducing the document demands from eleven to one. The Opposition then criticizes the
11 Trustee for a Separate Statement which refers only to the one remaining discovered dispute.
12 Rather than a defect, the reduction reduces the work load to parties and the Court alike. Yet the
13 Opposition excoriates the Trustee by failing to pursue all eleven original document categories in
14 the Separate Statement. That argument turns the facts upside down.

15 After discussions between his counsel and Bobby's counsel, the Trustee substantially
16 narrowed the document discovery. The Motion seeks enforcement of only one request: No. 1.
17 That request is limited to the witness's communications relating to Jonah's Petition. The Separate
18 Statement addresses only that request because it is the only document request the Trustee asks the
19 Court to enforce. The Opposition cannot transform the Trustee's voluntary narrowing of
20 discovery into a procedural default while simultaneously complaining that the original subpoena
21 was too broad.

22 The procedural objections do not alter the result. Before the scheduled deposition,
23 counsel for both moving party and the witness discussed his failure and refusal to have his
24 deposition taken, his claimed lack of relevant knowledge, the significance of his text messages,
25 and deposition logistics. (Motion Exhibit F, Lysaght December 13, 2025 Declaration., ¶ 2.)
26 After Bobby failed to appear, Trustee's counsel again sought compliance and offered to
27 reschedule before filing the Motion. (Lysaght Declaration, id. at ¶ 3, Exhibit F.) Bobby still did
28 not appear. John Lucas' much later proposal that the Trustee identify questions and accept a

1 declaration from the witness instead merely restates the premise of the Opposition; that Bobby
2 should be allowed to decide what testimony the Trustee receives and avoid cross-examination
3 altogether. That is not the law.

4 Bobby is entitled to the protections afforded every nonparty witness, but not more. He is
5 not entitled to a special exemption from a lawful subpoena because he considers himself too busy
6 or asserts his testimony will be unhelpful. The Court should order him to appear, testify, and
7 comply with Request No. 1, and award the relief requested in the Motion.

8 **II. BOBBY SAADIAN'S THREE THRESHOLD OBJECTIONS DID NOT EXCUSE**
9 **HIS FAILURE TO APPEAR**

10 In addition to specific objections directed to Request No. 1, the witness also had three
11 general objections. These general objections highlight the defects which permeate the
12 Opposition. First, the witness objected that he had “no knowledge relevant to the dispute,” was
13 neither a trustee nor beneficiary, had no relevant documents, and therefore could only be deposed
14 for purposes of harassment. But a witness’s assertion that he knows nothing is not admissible
15 testimony, and does not immunize the witness from testimony under oath or cross examination.

16 Bobby’s own contemporaneous statements refute his claim of no information. He claimed
17 to be “aware” of the Trustee’s supposed abuse of Jonah Saadian and Brandon Saadian and
18 threatened both to join and to finance their lawsuit. Those statements provide an objective basis
19 for examination regardless of how Bobby now characterizes his knowledge.

20 Second, Bobby objected that the Trustee could obtain any necessary information from
21 Jonah, Brandon, or the Trustee himself, making Bobby’s deposition “unnecessary and
22 duplicative.” That objection implicates Bobby’s awareness of the answers the Jonah and Brandon
23 will provide and the source of that information is a fertile area for discovery. The objection also
24 assumes that the testimony of the person who made the threats is interchangeable with testimony
25 from the people to whom or about whom they were made. It is not. Only the witness can testify
26 directly concerning what he meant, what information he possessed, the source of that information,
27 what discussions he had with Jonah and/or Brandon, whether anyone requested his assistance, and
28 whether he took or considered any steps to join or finance their litigation. Nor can the Trustee

1 obtain from himself communications between Bobby and third persons that the Trustee never
2 received.

3 Third, Bobby objected that the deposition date was selected unilaterally and that he was
4 unavailable. Even accepting the claimed unavailability, the remedy was to arrange another date or
5 seek court protection, not simply disregard the subpoena. Counsel had already discussed Bobby's
6 appearance and the possibility of remote attendance. After the nonappearance, Trustee's counsel
7 affirmatively offered another opportunity to reschedule before seeking judicial intervention.
8 Bobby never agreed to appear on any date and never did.

9 Whatever effect Bobby's objections may have had upon disputed document production,
10 they did not convert a subpoena commanding personal attendance into an optional invitation.
11 Bobby neither obtained an order quashing or modifying the subpoena nor agreed upon another
12 date. He simply did not appear.

13 **III. THE TRUSTEE PROPERLY SERVED BOBBY SAADIAN AND MADE**
14 **REASONABLE, GOOD-FAITH EFFORTS TO RESOLVE THE DISPUTE**

15 The witness's procedural objections obscure a simple chronology. He was personally
16 served with the deposition subpoena on October 12, 2025, nearly a month before the November 7
17 deposition date. The subpoena commanded his personal appearance and testimony. Bobby never
18 moved to quash the subpoena or sought a protective order.

19 After service of the subpoena, Lucas contacted moving party's counsel Brian Lysaght.
20 The two discussed the deposition, Bobby's claimed lack of relevant knowledge, the significance
21 of Bobby's text messages, and arrangements for his appearance. Lucas asked whether Bobby
22 could appear remotely and stated that he would "try" to get Bobby to appear. (Motion, Lysaght
23 December 13, 2025 Declaration, ¶ 2.) That was not a refusal to confer. The parties identified and
24 discussed the precise substantive dispute now before the Court: Lucas maintained that the witness
25 should not have to testify claiming he supposedly knew nothing relevant; the Trustee responded
26 that Bobby's own communications demonstrated otherwise and that a witness cannot avoid
27 examination by assuring the examining party that he has nothing useful to say. They also
28 discussed the mechanics of Bobby's appearance. (Id.)

1 Nor did the Trustee rush to Court after Bobby failed to appear, although he could have.
2 Trustee's counsel contacted Lucas regarding the nonappearance and the texts bearing directly on
3 Jonah's Petition. On December 1, 2025 Natasha Riggs wrote again, expressly offering Bobby
4 another opportunity to schedule the deposition before a motion was filed and proposing dates on
5 which counsel could confer and reschedule. Bobby still did not agree to appear. (Motion, Exhibit
6 F.) Only then did the Trustee seek judicial enforcement. In addition, the Trustee's counsel
7 attempted to meet and confer again after the motion was filed. (Riggs Reply Decl. ¶ 2, Exhibit J.)
8 Lucas did not respond. (Riggs Reply Decl. ¶ 2, Lysaght Reply Decl., ¶ 2.)

9 Lucas misrepresents that that Trustee's counsel did not discuss narrowing, rescheduling,
10 or otherwise resolving the dispute. (Lucas Opposition Decl., ¶ 3.) The contemporaneous record
11 demonstrates otherwise. Before the deposition, Lucas discussed Bobby's attendance and whether
12 he could appear remotely. (Motion, Lysaght December 13, 2025 Declaration, ¶ 2.) After Bobby
13 failed to appear, Trustee's counsel invited Lucas to arrange a new date. And the Trustee
14 narrowed the document dispute: rather than seek enforcement of eleven categories, he elected to
15 pursue only one.

16 The Opposition's complaint about the Separate Statement proves the opposite of what
17 Bobby suggests. The Separate Statement did not omit ten requests through oversight. The
18 Trustee purposefully limited the categories of documents for which he seeks an order compelling
19 production. That request, no. 1, seeks communications with any person relating to Jonah's
20 Petition to remove or suspend the Trustee. The other ten requests are not before the Court. There
21 was no reason to include them in a Separate Statement.

22 The complaint concerning service of the Motion is equally misplaced. Lucas criticizes
23 Trustee's counsel for attempting to serve the witness personally because Lucas says everyone
24 knew that he represented him. But representation is not authorization to accept service. When
25 Riggs asked Lucas on December 19 whether Bobby would authorize him to accept electronic
26 service, she specifically requested written authorization and advised that otherwise personal
27 service would be necessary. Lucas did not identify any prior written authorization. Only later
28 that day did Lucas state that he would accept service.

Neither asserted procedural defect provides a basis for the witness's refusal to comply. The record shows personal service of the subpoena, substantive discussions before the deposition, efforts after the nonappearance to obtain voluntary compliance, an offer to reschedule, substantial narrowing of the document discovery, and resort to the Court only after those efforts failed. Bobby's position has not changed. He argues that the Trustee should accept his statement that he knows nothing relevant, forego the deposition, and forego the right to cross-examine a plainly adverse witness. That is not a demand the discovery statutes require the Trustee to accept.

IV. BOBBY SAADIAN'S OWN EVIDENCE ESTABLISHES THE RELEVANCE OF HIS DEPOSITION AND GOOD CAUSE FOR THE LIMITED DOCUMENT DISCOVERY

Discovery extends to nonprivileged matter relevant to the subject matter of the action if the matter is itself admissible or appears reasonably calculated to lead to admissible evidence. (Code Civ. Proc., § 2017.010.) The discovery statutes are construed liberally in favor of disclosure. (*Williams v. Superior Court* (2017) 3 Cal.5th 531, 541.) Discovery is not conditioned upon possessing proof of the facts sought; one purpose of discovery is to determine the existence of facts. (*Id.* at 557-558.)

Here the witness's threats satisfy that standard. He told the Trustee: "I am aware of how you are abusing Jonah and Brandon", warned that the "last thing you want is for me to join them in a lawsuit against you," and shortly thereafter stated that he was "going to fund Brandon and Jonah's lawsuit against you as well." (Motion, Barkohanai Decl., ¶¶ 2-3, Exhibits H, I.) The litigation Bobby identified seeks to remove the Trustee and impose substantial surcharges. The threats by Bobby were not ambiguous references to unrelated family disagreements. He expressly claimed knowledge concerning Jonah and Brandon's grievances against the Trustee and threatened to participate financially and otherwise in their litigation.

The Trustee is entitled to examine what the witness meant. What "abuse" did he believe had occurred? What was the source of that claimed knowledge? What had Jonah or Brandon told him? What lawsuit did he understand he might join or fund? Had funding been discussed or requested? Apart from writing a check, did Bobby provide or offer legal, strategic, investigative,

1 referral, or other assistance? What communications preceded and followed the threats? A
2 declaration prepared for purposes of opposing this Motion cannot substitute for examination on
3 those subjects.

4 The witness's Declaration creates additional areas of inquiry. Bobby admits making the
5 statements but characterizes them as an "empty threat" made in the heat of the moment. (Bobby
6 Opposition Decl., ¶¶ 6, 8.) Whether the threat was "empty" is Bobby's present characterization.
7 His Declaration identifies no contemporaneous retraction of either threat. The Trustee is entitled
8 to inquire into such explanation.

9 More significantly, Bobby now supplies an explanation that does not eliminate relevance
10 but expands it. He states his threats arose "primarily" from a separate real-estate commission
11 dispute with the Trustee, acknowledges that the dispute had "come to a head," and states that the
12 dispute was the "catalyst" for his threats. (Bobby Decl., ¶¶ 9-10.) That dispute remains
13 unresolved. Having placed that dispute at the center of his explanation for the threats, Bobby
14 cannot now contend that the relationship between the two disputes is beyond discovery. The
15 Trustee is entitled to inquire into it to the extent necessary to determine Bobby's motive, bias,
16 hostility, credibility and whether that hostility affected his communications or conduct concerning
17 Jonah and Brandon's litigation.

18 The witness makes another significant admission. He states that "[t]he only
19 communications I have had with family members concerning the Trust or the parties to this
20 litigation are of a purely personal family nature" and therefore, in his view, irrelevant. (Bobby
21 Decl., ¶ 13.) Jonah and Brandon are brothers and are Bobby's cousins. Mr. Barkohanai is also
22 the Trustee of their separate trusts. (See related case nos. 24STBP00592 and 24STPB00604.)
23 Thus, Bobby admits that communications concerning the Trust or the parties occurred. He
24 simply asks the Court to accept his unilateral characterization of them without permitting the
25 Trustee to learn their substance. A witness does not determine the discoverability of his own
26 communications merely by labeling them "personal." Even if "personal" such communications
27 are not privileged or immune from discovery.

28 The same is true of Bobby's statement that he alone conducted a "reasonable and diligent

1 search” of his files, devices, and email accounts and found no responsive documents. (Bobby
2 Decl., ¶ 11.) That assertion raises ordinary deposition questions concerning what was searched,
3 which devices and accounts were examined, what messaging platforms were included, how the
4 search was conducted, and whether responsive communications once existed but are no longer
5 retained. Again, the witness’s declaration supplies matters to be examined; it does not eliminate
6 the right to examine the witness about such matters.

7 Nor is the document discovery now before the Court remotely comparable to the
8 discovery condemned in *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th
9 216. *Calcor* involved sweeping document categories which, in substance, demanded virtually
10 everything in a nonparty corporation’s files concerning a broad subject over many years, without
11 an evidentiary showing connecting those materials to the issues in litigation. (Id. at 221-225.)
12 The court required specific facts establishing good cause before imposing that burden upon a
13 nonparty.

14 Here, moving party has already eliminated any comparable concern. The original
15 subpoena contained eleven categories, but the Trustee seeks enforcement of only one. Request
16 No. 1 is limited to communications relating to Jonah Saadian’s Petition to remove or suspend the
17 Trustee. It identifies the proceeding, the subject matter, and the type of material sought.
18 And unlike *Calcor*, there is direct evidence establishing why those communications may exist and
19 why they matter. The Trustee need not speculate that Bobby may know something about Jonah
20 and Brandon’s grievances: Bobby said that he did. The Trustee need not speculate that Bobby
21 contemplated involvement in their litigation: Bobby threatened to join and fund it. And the
22 Trustee need not speculate about a potential source of bias or motive: Bobby now identifies his
23 unresolved business dispute with the Trustee as the catalyst for those threats.

24 Thus, to the extent *Calcor* requires good cause for the document production sought from
25 this nonparty, good cause is established by Bobby’s own statements and sworn Declaration. The
26 Trustee seeks testimony concerning Bobby’s knowledge, communications, bias, motive,
27 threatened financial participation, and possible coordination with Jonah and Brandon, together
28 with documents limited to communications concerning the Petition itself.

1 The appropriate discovery device for determining those facts is a deposition - - not a
2 declaration from the witness with no cross-examination.

3 **V. THE LIMITED DISCOVERY SOUGHT IS NEITHER UNDULY BURDENSOME**
4 **NOR OPPRESSIVE**

5 Bobby's burden argument addresses discovery the Trustee no longer seeks. The
6 Opposition repeatedly characterizes the subpoena as containing eleven "sweeping" document
7 requests. The historical fact is correct; its relevance to this Motion is not. The Trustee has limited
8 the requested order to production under Request No. 1. The Court is not being asked to compel
9 compliance with the remaining ten categories.

10 What remains is straightforward: Bobby must appear for a deposition and produce any
11 responsive communications concerning Jonah's Petition. Bobby's claimed testimonial burden
12 consists principally of the assertion that he is too important and busy to testify. (Bobby Decl., ¶
13 15.) He asserts that a deposition inconvenient. But that does not make it oppressive. Bobby
14 identifies no extraordinary expense, unusual travel requirement, physical impediment, or other
15 circumstance making attendance impracticable. The original deposition was noticed
16 approximately a few miles from his residence and Trustee's counsel thereafter offered to
17 reschedule it.

18 Bobby's argument is also circular. He contends that taking time from his business is
19 unduly burdensome because, in his view, his testimony will produce nothing useful. But whether
20 Bobby possesses relevant information is precisely what the deposition is intended to determine.
21 His admitted statements concerning his knowledge of the supposed "abuse" of Jonah and
22 Brandon, his threatened participation in their lawsuit, his threatened financing of that lawsuit, and
23 his newly asserted explanation that an unresolved business dispute motivated those threats defeat
24 the premise that the deposition lacks a legitimate discovery purpose.

25 Nor does Bobby's assertion that he found no responsive documents establish any
26 meaningful production burden. If his search was complete and there truly are no responsive
27 documents, compliance with Request No. 1 should require little effort. It does not, however,
28 eliminate the need for or entitlement to a deposition to test the veracity of such statement.

1 Section 1987.1 protects a nonparty from unreasonable or oppressive demands; it does not
2 confer immunity from ordinary discovery inconvenience. The Discovery Act separately requires
3 limitation only where burden, expense, or intrusiveness clearly outweighs the likelihood that the
4 information sought will lead to admissible evidence. (Code Civ. Proc., §§ 1987.1; 2017.020.)
5 Here, the Trustee has already substantially reduced any burden by abandoning ten of the eleven
6 document requests and seeking only communications concerning the Petition itself.
7 Any genuine scheduling concern can readily be accommodated in setting the deposition. It
8 provides no basis for refusing to comply with the subpoena and testify at a deposition.

9 **VI. CONCLUSION**

10 Bobby Saadian was personally served with a subpoena requiring him to appear and testify.
11 He neither moved to quash nor sought a protective order, and he did not appear. The Court
12 should therefore grant the Motion, order Bobby Saadian to appear and testify at deposition on a
13 date promptly agreed upon by counsel or fixed by the Court, order him to produce all responsive
14 documents within his possession, custody, or control responsive to Request No. 1, and award the
15 sanctions and other relief requested in the Motion.

16
17 Dated: August 19, 2026

LYSAGHT LAW GROUP LLP

18
19 By: /s/ Brian C. Lysaght
20 Brian C. Lysaght
21 Natasha Riggs
22 Attorneys for Matthew Barkohanai, Trustee of
23 The Second Amended and Restated George
24 Saadian Revocable Living Trust
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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 Reply to the Opposition to 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 \$4,910 in sanctions for his failure to comply and for having to bring this motion.

2. Attached hereto as Exhibit J is a true and correct copy of the email I sent to John Lucas on February 27, 2026 at 3:59 p.m. In that email, I asked as follows:

I am writing to inquire again whether your client has reconsidered his refusal to be deposed. We would like to avoid having the Court of spend time on the motion we filed.

I am certain we can work out a date and time for the deposition. As previously advised, my office is minutes away from his home.

3. I never received a response to my February 27, 2026 offer from John Lucas or any other person on behalf of Bobby Saadian.

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 August 19, 2026 at Los Angeles, California.

/s/ Natasha Riggs
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 Reply to the Opposition to 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 \$4,910.00 in sanctions for his failure to comply and for having to bring this motion.

2. I never received a response from John Lucas or any other person on behalf of the witness Bobby Saadian to Natasha Riggs' February 27, 2026 offer appended as Exhibit J.

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 August 19, 2026 at Los Angeles, California

/s/ Brian C. Lysaght
Brian C. Lysaght

EXHIBIT J



Natasha Riggs <nriggs@lysaghtlegal.com>

Bobby Saadian Deposition

1 message

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

Fri, Feb 27, 2026 at 3:59 PM

Good Afternoon Mr. Lucas,
I am writing to inquire again whether your client has reconsidered his refusal to be deposed. We would like to avoid having the Court of spend time on the motion we filed.
I am certain we can work out a date and time for the deposition. As previously advised, my office is minutes away from his home.

We look forward to your client's cooperation.

Regards.

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 6:05 PM, Natasha Riggs <nriggs@lysaghtlegal.com> wrote:

Served here per your request:

. 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.

<image770769.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

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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.

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 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.

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 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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<2025.12.13_Mx Compel Subpoena Compliance_BobbySaadian (12.19 Service).pdf>

<2025.12.13_SepStmt Mx Compel Subp Compliance.pdf>

<2025.12.10_Proof of Service.pdf>

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PROOF OF SERVICE
In the Matter of the Second Amended and Restated George Saadian Revocable Living Trust
L.A.S.C. Case No. 23STPB12471

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the County of Los Angeles, State of California. I am over the age of 18, an active member of the State Bar of California and not a party to this case. My business address is 401 Wilshire Blvd., 12th Floor, Santa Monica, CA 90401.

On August 19, 2026, at Los Angeles, I served the foregoing document described as **TRUSTEE AND RESPONDENT MATTHEW BARKOHANAI'S REPLY TO OPPOSITION TO MOTION FOR ORDER COMPELLING NON PARTY BOBBY B. SAADIAN'S COMPLIANCE WITH DEPOSITION SUBPOENA; DECLARATIONS OF NATASHA RIGGS AND BRIAN C. LYSAGHT; EXHIBIT J** on the parties and interested persons as follows:

See Attached Service List

☐ BY MAIL I deposited the envelope containing the identical documents (without the Reservation ID on the caption page of the motion and without the reservation receipt appended to the motion) with the U.S. Postal Service, on that same day with postage thereon fully prepaid at Santa Monica, California.

☐ BY PERSONAL SERVICE

☒ **BY ELECTRONICALLY SERVING** the document(s) to the electronic mail address(es) set forth herein on this date before 11:59:59 p.m. pursuant to and consistent with Code of Civil Procedure § 1010.6 and Calif. Rule of Court 2.251, from email address nriggs@lysaghtlegal.com.

☐ BY FEDERAL EXPRESS I caused such envelopes to be served via Federal Express for next business day delivery.

☒ (STATE) I declare under penalty of perjury that the foregoing is true and correct.
☐ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

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 19, 2026 at Los Angeles, California.

/s/ Natasha Riggs
Natasha Riggs

SERVICE LIST

In the Matter of the Second Amended and Restated George Saadian Revocable Living Trust
L.A.S.C. Case No. 23STPB12471

Jesse R. Booth, Esq.
BOOTH LAW CORPORATION
5857 Owens Ave., Suite 300
Carlsbad, CA 92008
jess@boothlawcorp.com

Attorney for Blanca Calderon

Steven Morris, Esq.
Jonathan M. Deer, Esq.
QUANTUM LAW GROUP, LLP
8383 Wilshire Blvd. 935
Beverly Hills, CA 90211
steven@quantumlawgroup.com
jon@quantumlawgroup.com

Attorney for Jonah Saadian

Lindsey F. Munyer, Esq.
Monica Yun, Esq.
KEYSTONE LAW GROUP, P.C.
11300 W. Olympic Blvd., Suite 910
Los Angeles, CA 90064
lindsey@keystone-law.com
monica@keystone-law.com

Attorney for Jonah Saadian

Mina Sirkin, Esq
SIRKIN LAW GROUP, PC
21550 Oxnard Street #300
Woodland Hills, CA 91367
minasirkin@gmail.com

Attorney for Trustee of the Parvin Toufer Trust
and Shoushan Movsesian

John Lucas, Esq.
Wilshire Law Firm, PLC
(800) 52-CRASH
660 S. Figueroa St., Sky Lobby,
Los Angeles, CA 90017
john.lucas@wilshirelawfirm.com

Counsel for nonparty witness Bobby Saadian