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RONEN SHLOMO and BSECURE

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 STEPHEN RUSSELL, an individual,

12 Plaintiff,

13 vs.

14 NIR MAMAN, an individual; CT707  
ISRAELI KRAV SYSTEMS, INC., an Ontario  
15 Corporation; GEORGE AKKELQUIST, an  
individual; DFW METROPLEX TRAINING  
16 ACADEMY, a New York entity form  
unknown; and DOES 1 through 20, inclusive,

17 Defendants.

18  
19 AND RELATED COUNTER-CLAIMS

20  
21 NIR MAMAN, an individual; CT707  
ISRAELI KRAV SYSTEMS, INC., an Ontario  
22 Corporation,

23 Third Party Plaintiffs,

24 vs.

25 RONEN SHLOMO, an individual;  
BSECURE, a California Corporation; and  
26 FOES 1-50,

27 Third Party Defendants.

CASE NO. 3:18-cv-6691-RS

**THIRD PARTY DEFENDANTS RONEN  
SHLOMO AND BSECURE'S FIRST SET  
OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND ESI BY NIR MAMAN  
AND CT707 ISRAELI KRAV SYSTEMS,  
INC.**

1 **PROPOUNDING PARTIES: RONEN SHLOMO and BSECURE**

2 **SET NO.: ONE**

3 **RESPONDING PARTIES: NIR MAMAN and CT707 ISRAELI KRAV SYSTEMS, INC.**

4 Pursuant to Rule 34, Civil L.R. 34-1, the Court's Case Management Scheduling Order, and  
5 other applicable law and rules, Third Party Defendants Ronen Shlomo and Bsecure (who had not  
6 appeared when Rule 26 Initial Disclosures were made) hereby request that within 33 days after  
7 service hereof, Defendants, Counterclaimants and Third Party Plaintiffs Nir Maman and CT707  
8 Israeli Krav Systems, Inc. (collectively, "Responding Parties") serve a response to these demands,  
9 and within 35 days after service hereof, or if that day is a Saturday or Sunday, the following  
10 Monday ("the date of production"), produce for inspection and copying, either by producing at the  
11 offices of Lewis Brisbois Bisgaard & Smith LLP, 333 Bush Street, Suite 1100, San Francisco, CA  
12 94104 at 1 p.m. on the date of production, or by providing via email a link from which they can be  
13 downloaded or delivering or mailing a thumb drive on or before the date of production, the  
14 following documents or electronically stored information - including writings, drawings, graphs,  
15 charts, photographs, sound recordings, images, and other data or data compilations - stored in any  
16 medium from which information can be obtained either directly or, if necessary, after translation  
17 by the responding party into a reasonably usable form.<sup>1</sup> Please produce email in its native file  
18 format, as .MSG files, if possible, and if PDF files are being produced, please create them by  
19 converting native files to preserve the original text and metadata in searchable form.

20 1. Any and all documents or electronically stored information constituting, or included in,  
21 Responding Parties Initial Disclosure under Rule 26 (a) of the Federal Rules of Civil Procedure in  
22 this action, if any such disclosure has been made.

23 2. Any and all documents or electronically stored information constituting or included in

24  
25 <sup>1</sup> To facilitate compliance with the requirement of Civil L.R. 34-1 to set forth each request in full  
26 before each response or objection, Responding Parties may request an electronic copy of this set of  
27 requests by sending an email to counsel for Propounding Parties.

1 any further disclosure (made pursuant to Rule 26 (e)) to supplement or amend Responding Parties'  
2 initial disclosure (if any such disclosure has been made) under Rule 26 (a) in this action.

3 3. Any and all deposition notices and written discovery requests (including but not limited  
4 to interrogatories; requests for admission; and requests for production of documents, ESI, tangible  
5 things or land) propounded to any party in this action by Responding Parties, or either of them.

6 4. Any and all objections to deposition notices and responses to written discovery requests  
7 (including but not limited to interrogatories; requests for admission; and requests for production of  
8 documents, ESI, tangible things or land) received by Responding Parties, or either of them, in  
9 response to any deposition notice or written discovery propounded to any party in this action by  
10 Responding Parties, or either of them.

11 5. Copies of any and all documents or ESI produced by Responding Parties, or either of  
12 them, in response to any request for production of documents and ESI served on them, or either of  
13 them.

14  
15 DATED: January 9, 2020

LEWIS BRISBOIS BISGAARD & SMITH LLP

16 By: Kendall A. Layne

Alex A. Graft

Kendall A. Layne

17 Attorneys for Third Party Defendants

18 RONEN SHLOMO and BSECURE

1 **FEDERAL COURT PROOF OF SERVICE**

2 *Russell v. Maman, et al.*  
3 US District Court, California Northern District, Case No. 3:18-CV-6691-RS-SK

4 STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

5 At the time of service, I was over 18 years of age and not a party to the action. My  
6 business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872. I am employed  
7 in the office of a member of the bar of this Court at whose direction the service was made.

8 On January 10, 2020, I served the following document(s): THIRD PARTY  
9 DEFENDANTS RONEN SHLOMO AND BSECURE'S FIRST SET OF REQUESTS FOR  
10 PRODUCTION OF DOCUMENTS AND ESI BY NIR MAMAN AND CT707 ISRAELI  
11 KRAV SYSTEMS, INC.

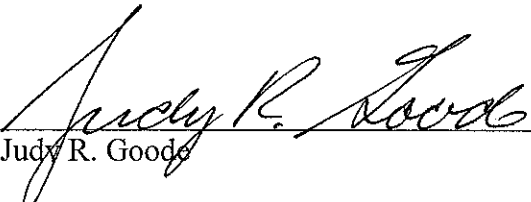
12 I served the documents on the following persons at the following:

13 Darren S. Enenstein 14 Ned Morrison Gelhaar 15 Nima Kamali 16 Joy Melina Diaz Llaguno 17 ENENSTEIN PHAM & GLASS, LLP 18 12121 Wilshire Boulevard, Suite 600 19 Los Angeles, CA 90025	Attorneys for Plaintiff STEPHEN RUSSELL Tel: (310) 899-2070 Fax: (310) 496-1930 Email: <a href="mailto:dse@enensteinlaw.com">dse@enensteinlaw.com</a> <a href="mailto:ngelhaar@enensteinlaw.com">ngelhaar@enensteinlaw.com</a> <a href="mailto:nkamali@enensteinlaw.com">nkamali@enensteinlaw.com</a> <a href="mailto:illaguno@enensteinlaw.com">illaguno@enensteinlaw.com</a>
20 Rod Divelbiss 21 JRA LAW PARTNERS, LLP 22 450 Pacific Avenue, Suite 200 23 San Francisco, CA 94133	Attorneys for Defendants NIR MAMAN and CT707 ISRAELI KRAV SYSTEMS, INC. Tel:(415) 788-4646 Fax: (415) 788-6929 Email: <a href="mailto:rdivelbiss@jralp.com">rdivelbiss@jralp.com</a>
24 Dek Ketchum 25 LAW OFFICES OF DEK KETCHUM 26 900 Veterans Boulevard, Suite 600 27 Redwood City, CA 94063	Attorneys for Defendants GEORGE AKKELQUIST and DFW METROPLEX TRAINING ACADEMY Tel: (650) 368-2588 / Fax: (650) 369-7183 Email: <a href="mailto:dek@ketchumlawoffice.com">dek@ketchumlawoffice.com</a>
28 Robert Allen Hufnagel RESNICK & LOUIS, P.C. 3350 Shelby Street, Suite 200 Ontario, CA 91764	Attorneys for Defendants RYAN MICHELETTI, LEGION INDUSTRIES, INC., LEGION INDUSTRIES, INC. dba SHIELDS CORPS SECURITY Tel: 909-458-0110 / Fax: 909-906-1277 Email: <a href="mailto:rhufnagel@rlattorneys.com">rhufnagel@rlattorneys.com</a>

29 The documents were served by the following means:

30  (BY U.S. MAIL) I enclosed the documents in a sealed envelope or package  
31 addressed to the persons at the addresses listed above and I deposited the sealed envelope or  
32 package with the U.S. Postal Service, with the postage fully prepaid.

33 I declare under penalty of perjury under the laws of the United States of America and the  
34 State of California that the foregoing is true and correct. Executed on January 10, 2020, at San  
35 Francisco, California.

36  
37   
38 Judy R. Goode