

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Chris Gregerson,

Plaintiff,

v.

Morgan Smith, Boris Parker, and
Vladimir Kazaryan; Smith & Raver,
LLP, Saliterman & Siefferman, PC, and
Bassford Remele, PA, Minnesota Law
Firms,

Defendants.

Case Type: OTHER CIVIL
Court File No.: 27-CV-09-13489
Judge: John Q. McShane

**PLAINTIFF'S
INTERROGATORIES, REQUEST
FOR PRODUCTION OF
DOCUMENTS, AND REQUEST
FOR ADMISSIONS TO
DEFENDANT BASSFORD
REMELE, SET 1**

To: Bassford Remele, PC, c/o Paul Peterson, Lind, Jensen, Sullivan & Peterson, P. A.,
150 South Fifth St, Ste 1700, Minneapolis, MN 55402-4217

Pursuant to Minnesota Rules of Civil Procedure, Rules 33, 34, and 36, Plaintiff serves upon you and demands answers to the following interrogatories, requests for production of documents, and request for admissions. Minnesota rules provide that you must serve your separate written answers or objections to each interrogatory and request for admission within 30 days after this service.

Definitions

For the purpose of these discovery requests, the following definitions apply:

1. "You" or "your" means Bassford Remele, P.A., or anyone acting on it's behalf.
1. "[Original Corporate Plaintiff]" means [Original Corporate Plaintiff] and/or [Original Corporate Plaintiff] Realty, Inc.
2. The "Zubitskiy photo agreement" means the sales agreement for photos allegedly purchased by [Original Corporate Plaintiff] from Michael Zubitskiy, dated March 19th, 2004, and included in the Complaint as exhibit D.
3. In regards to a person or company, "identify" means to state the name, address, and

1 As a result of a settlement with the original corporate plaintiff and it's owner, I am not publishing the names of those parties on-line. They have been replaced with generic terms in this discovery request. This document is not intended as legal advice or guidance of any kind, and all rights are reserved.

telephone number, and their relationship to you.

4. In regards to a document, "identify" mean state the title of the document, the author and date it was created, the a short description of the content or the document's purpose.
5. Other terms shall have their ordinary and usual meanings.

Instructions

1. Answer each of the following discovery request separately and fully in writing and under oath.
2. Include all information within your knowledge, the knowledge of your attorneys, any past or present staff, and any investigators employed by you or your attorneys.
3. These discovery requests are continuing, and you must amend your responses if new information or evidence becomes known to you.
4. If your response is an objection, respond to any portion of the request to which your objection does not apply.
5. If an original is requested but is not available (or is objected to), and a copy or duplicate is available (or not objected to), provide the copy.
6. If a document being requested was in your custody or was known to you, but is no longer available, provide a description of the document, including the contents, and set forth how the document left your possession.
7. If after due diligence in investigating and researching a discovery request, you cannot respond fully, answer to the best of your knowledge and explain your inability to give a complete answer.
8. In response to requests for discovery about communications, dealings, or events, set forth the place and/or medium (such as by phone), identify the nature of the communication or event, and identify all parties who were present or involved.
9. If any response to a request for the production of documents involves in excess of 250 pages, please confer with me about reducing the scope of the request or providing the documents in electronic form.

Interrogatories, Set 1

1. Describe any policy your firm had in place in 2007 to prevent your attorneys (whether partners, associates, or otherwise) from engaging in professional misconduct, legal malpractice, introducing forged evidence, or representing baseless claims. If this policy is in written form, please produce it under request for production of documents no. 3, below.
2. Describe Boris Parker's role at the firm during his employment, including his job duties and responsibilities, the scope and limits of his employment and authority, and his annual compensation for the last year he worked there.

3. Identify who, if anyone, at Bassford Remele supervised Boris Parker's litigation on behalf of [Original Corporate Plaintiff]/[Owner of OCP] against Chris Gregerson, including anyone who gave Boris Parker permission to represent [Original Corporate Plaintiff].
4. Describe what action anyone at your firm took to supervise, oversee, or review Boris Parker's work litigating on behalf of [Original Corporate Plaintiff]/[Owner of OCP] against Chris Gregerson. Produce any records of this under request for production of documents no. 3, below.
5. Describe what sanctions, if any, have been imposed against your firm or a firm attorney by a court of law or regulatory board/agency in the last 10 years. Include the date, the sanction, and the reason for the sanction.
6. Identify any Complaints filed against your firm, or any firm attorney, for malicious prosecution, abuse of process, or legal malpractice (or vicarious liability for same), in the last 10 years. State the Plaintiff, jurisdiction, date of the Complaint, cause of action, and outcome.
7. State how much money your firm received for the litigation brought against Chris Gregerson, including the portion which the firm retained and the portion which went to Boris Parker.
8. Identify any insurance policy which may afford coverage in this action and identify the amounts payable (pursuant to Minn. R. Civ. P. 26.02(c)).
9. State the reason Boris Parker left your firm and/or you fired or discharged him. If there is a written record of this, provide it in response to request for production of documents no. 3, below.
10. State whether Boris Parker was ever disciplined, reprimanded, demoted, or received a negative performance review while working at your firm. Produce any records of this under request for production of documents no. 3, below.
11. Identify any joint defense agreements, or any other agreements, you have entered into with other defendants in this case since service of the Complaint, and produce a copy of such agreements in response to request for production no. 3, below.

Request for production of documents, Set 1

1. Produce a copy of all correspondence (including email) between yourself and Boris Parker (or any other party) which discusses or references [Original Corporate Plaintiff], [Owner of OCP], Chris Gregerson, or Michael Zubitskiy. If a claim of privilege is asserted to any documents, provide a privilege log for those documents.
2. Produce a copy of any insurance policy identified in interrogatory 8, above.
3. Produce copies of any other documents you have relied upon in answering the interrogatories above or the request for admission, below.
4. Produce copies of any documents you plan to introduce at trial.

Requests for Admission, Set 1

Pursuant to Minn. R. Civ. P. 36.01, Defendant hereby request Plaintiff to admit, for purposes of this action, the truth of the following statements. Please admit that:

1. There is no credible evidence to support the belief that Michael Zubitskiy exists or was the source of the controverted photos in the litigation Boris Parker brought (on behalf of [Original Corporate Plaintiff]) against Chris Gregerson
2. The Zubitskiy photo agreement is fraudulent.
3. [Original Corporate Plaintiff] obtained Chris Gregerson's photos from Chris Gregerson's website, as ruled by US District Court Judge Ann D. Montgomery in her findings of fact, conclusions of law, and order for judgment (Complaint exhibit A, pp. 11).
4. No managers, supervisors, or owners at Bassford Remele ever asked Boris Parker, [Original Corporate Plaintiff], or [Owner of OCP] if the Zubitskiy photo agreement was forged or genuine.
5. No managers, supervisors, partners, or owners at Bassford Remele ever ordered Boris Parker to cease representing [Original Corporate Plaintiff] in the litigation against Chris Gregerson.

Date: _____

Chris Gregerson
Plaintiff, pro se
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New Richmond, WI 54017
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