

FOUNDED AS
ASHLEY & NEUMILLER
JANUARY 1903

RUDY V. BILAWSKI

Neumiller & Beardslee

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS

FIFTH FLOOR WATERFRONT OFFICE TOWER II
509 WEST WEBER AVENUE
STOCKTON, CALIFORNIA 95202

MAILING ADDRESS:
P.O. DRAWER 20
STOCKTON, CALIFORNIA 95201-9970
TELEPHONE (209) 948-8200

September 13, 1984

Laurence E. Drivon, Esq.
Belli, Drivon & Bakerink
215 North San Joaquin Street
Stockton, California 95202

Re: Richard Berberian v. Haig Berberian
Case No. 813484

Dear Larry:

Enclosed herewith I am handing you a set of Interrogatories to be answered by Haig Berberian. At long last, I have completed this assignment. I want you to know that it required one week of vacation time to do it.

As you know, trial law is not my forte and I, therefore, request that you review the enclosed and make whatever changes are necessary and, also, whatever additions you can think of.

After going through this exercise, I am sure that I don't want any more of it. I do not have the time nor the inclination to engage in trial work. From here on out, therefore, I want you to do all of the work in this matter and, of course, that will entitle you to all of the fees. I do not mind discussing economic issues and strategy or accounting problems, but interrogatories, depositions, trial preparation, and all that, is beyond my competence and I simply just do not have the time for it.

After you have reviewed the enclosed, please call me so that we can sit down together and discuss it.

With best regards,

Sincerely yours,



RUDY V. BILAWSKI
Attorney at Law

RVB/jg
Enclosure

cc/enc: Richard Berberian ✓

1 LAURENCE E. DRIVON
2 LAW OFFICES OF BELLI, DRIVON & BAKERINK
3 215 North San Joaquin Street
4 Stockton, California 95202
5 Telephone: (209) 466-0982

6 Attorneys for Plaintiff

7
8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

9
10 RICHARD BERBERIAN,
11 Plaintiff,

12 vs.

13 HAIG BERBERIAN, as an individual
14 and a general partner, HAIG BERBERIAN
15 CORP., a California Corporation, HAIG
16 BERBERIAN CORP., as a general partner,
17 ISABEL BERBERIAN CORP., a California
18 Corporation, ISABEL BERBERIAN CORP.,
19 as a general partner, ISABEL BERBERIAN,
20 as an individual, BERBERIAN ORCHARDS,
21 a limited partnership, SEXTON NUT
22 PROCESSORS, INC., a California
23 Corporation, WELLS FARGO BANK, a
24 National Banking Association, WELLS
25 FARGO BANK, a National Banking
26 Association, as trustee, and DOES
27 26 through 50, inclusive,

28 Defendants.

CASE NO.: 813484

INTERROGATORIES

23 PROPOUNDING PARTY: Plaintiff RICHARD BERBERIAN

24 RESPONDING PARTY: HAIG BERBERIAN, an individual;
25 ISABEL BERBERIAN, an individual;
26 HAIG BERBERIAN CORP., a
27 California corporation; and
28 ISABEL BERBERIAN CORP., a
California corporation.

SET NO.: One

1 Pursuant to the provisions of Section 2030 of the Code
2 of Civil Procedure, Plaintiff RICHARD BERBERIAN requires
3 that Defendants HAIG BERBERIAN, ISABEL BERBERIAN, HAIG
4 BERBERIAN CORP. and ISABEL BERBERIAN CORP. answer the following
5 Interrogatories within thirty days.

6
7 Please note that in answering these Interrogatories,
8 you should furnish all information known or available to you
9 regardless of whether this information is possessed directly
10 by you or by your agents, employees, representatives, investi-
11 gators, or by your attorneys or their agents, employees,
12 representatives or investigators.

13
14 If any of these Interrogatories cannot be answered in
15 full, please answer to the extent possible, specifying the
16 reasons for your inability to answer the remainder, and
17 stating whatever information, knowledge, or belief you do
18 have concerning the unanswered portion.

19
20 Definitions: The following definitions apply to each
21 of these Interrogatories:

22
23 1. The words "person" and "persons" or "individual"
24 and "individuals" mean all entities of every description and
25 includes all associations, companies, partnerships, and
26 corporations.

27
28 2. The word "documents" means all written, recorded,

1 or graphic matters, however produced or reproduced, and all
2 "writings" as defined in Evidence Code Section 250.

3
4 3. The words "identify" or "identity" when used with
5 respect to a person or persons mean the answering party is
6 required to state names and addresses of such person or
7 persons, and the name of the employer and place of employ-
8 ment of such person or persons.

9
10 4. The words "identify" or "identity" when used with
11 respect to a document or documents mean the answering party
12 is required to describe the document or documents by date,
13 serial or other identifying number, subject matter, names of
14 all persons who wrote, signed, initialed, dictated, or
15 otherwise participated in the creation of the same and their
16 names and their addresses. The answering party is also
17 required to state the present location of said documents,
18 and the names and addresses of the person or persons who
19 have custody of the same.

20
21 5. The terms "you" or "your" refer to the responding
22 party and each of them.

23
24 6. The terms "he" or "him" refer to both genders.

25
26 INTERROGATORIES

27
28 1. As to Defendants HAIG BERBERIAN CORP., a California

1 corporation, and ISABEL BERBERIAN CORP., a California corpora-
2 tion, state:

3
4 (a) The date each corporation was formed;

5
6
7 (b) The principal place of business;

8
9
10 (c) The name and residence and business address
11 of each officer, director and shareholder during the period
12 from 1957 through 1974.

13
14
15 2. As to Defendant HAIG BERBERIAN, state:

16
17 (a) Full name;

18
19
20 (b) Residence address;

21
22
23 (c) Business address;

24
25
26 (d) Social Security number;

27
28

1 (e) Name and residence and business addresses of
2 present spouse, if any;

3
4
5 (f) Name and residence addresses of all previous
6 spouses, if any;

7
8
9 (g) Name and residence and business addresses of
10 all children, if any.

11
12
13 3. As to Defendant ISABEL BERBERIAN, state:

14
15 (a) Full name;

16
17
18 (b) Residence address;

19
20
21 (c) Business address;

22
23
24 (d) Social Security number;

25
26
27
28

1 (e) Name and residence and business addresses of
2 present spouse, if any;

3
4
5 (f) Name and residence addresses of all previous
6 spouses, if any;

7
8
9 (g) Name and residence and business addresses of
10 all children, if any.

11
12
13 4. As to Defendant HAIG BERBERIAN, state each of his
14 jobs, businesses, and occupations for the last twenty-five
15 years, and further state:

16
17 (a) The inclusive dates for each job, business,
18 and occupation;

19
20
21 (b) The name of the entity he worked for;

22
23
24 (c) The address of each such business he worked
25 for;

1 (d) A general summary of his responsibilities for
2 each job, business or occupation.

3
4
5 5. Identify and give the business and residence
6 addresses of each and every person known to you to have
7 knowledge of facts relative to the subject matters of this
8 action.

9
10
11 6. Have you or any of your agents obtained from the
12 plaintiff or his agents or from any other person any written
13 statement, signed or unsigned, or any recorded or court
14 reported statement relating to any issue in this case?

15
16
17 7. If your answer to the preceding interrogatory is
18 "yes", state with respect to each such statement:

19
20 (a) The name and residence and employment addresses
21 of the person who gave it;

22
23
24 (b) The name and address of the person having
25 custody of it;

1 (c) The date and place it was taken, and in whose
2 presence and by whom it was obtained, and whether it was
3 written or recorded;

4
5
6 (d) If you will do so without a court order,
7 please attach a copy of any written statements to your
8 answers to these interrogatories.

9
10
11 8. State the names and residence and business addresses
12 of all persons from whom you have obtained any oral statement
13 relating to any issue in this case.

14
15
16
17 9. With respect to each oral statement identified in
18 the preceding interrogatory, state:

19
20 (a) The contents of such oral statement;

21
22
23 (b) The name and residence and employment
24 addresses of the person who obtained this statement;

1 (c) The name and residence and business addresses
2 of the person or persons having custody of it.

3
4
5
6 10. Have you, or anyone acting on your behalf, employed
7 or retained any person or persons for the purpose of evaluating
8 or rendering an opinion relative to any issue in this case?

9
10
11 11. If your answer to the preceding interrogatory is
12 "yes", state:

13
14 (a) The name, business and residence addresses,
15 and occupation of each such person or persons;

16
17
18
19 (b) Whether or not a written report has been made
20 by such person or persons; and

21
22
23 (c) If a written report has been made by such
24 person or persons, state whether you are willing to provide
25 a copy of such a report voluntarily (if so, please attach a
26 copy of such report to your answers to these interrogatories).

1 12. State your capital account in Haig Berberian, a
2 limited partnership, at year end for the years 1966 through
3 1972.

4
5
6
7 13. State all distributions made by Haig Berberian, a
8 limited partnership, during the years 1957 through 1972.
9 Please include distributions of cash, property, credits and
10 deductions.

11
12
13
14 14. Identify all items of cash, real property, personal
15 property or other items of value which you received from
16 Haig Berberian, a limited partnership, during each year from
17 1957 through 1972.

18
19
20
21 15. For each year during the period from 1968 through
22 1972, please state what funds and other property you or any
23 other person borrowed from Haig Berberian, a limited partnership.
24 Please state the terms and conditions of each borrowing and
25 include its documentation.

1 16. Do you contend that Haig Berberian, a limited
2 partnership, was a capital intensive or a labor intensive
3 investment? Please state the reasons for your answer.
4

5
6
7 17. For each year during the period from 1968 through
8 1972, please state what funds Haig Berberian, a limited
9 partnership, borrowed from Wells Fargo Bank. Please state
10 the terms and conditions of each borrowing, the reasons for
11 the borrowing and include its documentation.
12

13
14
15 18. For each year during the period from 1967 through
16 1972, please furnish the following:
17

18 (a) A listing of all accounts receivable and
19 other extensions of credit made by Haig Berberian, a limited
20 partnership. Please indicate the amount and the debtor
21 involved;
22

23
24 (b) A listing of all security interests in real
25 or personal property received by Haig Berberian, a limited
26 partnership;
27
28

1 (c) A listing of all write-off's of accounts
2 receivable, bad debts and other credit extensions made by
3 Haig Berberian, a limited partnership. Please indicate the
4 amount and the debtor involved.
5
6
7

8 (d) A listing of all foreclosures, collection
9 suits, settlements, accommodations, compromises and similar
10 actions taken by Haig Berberian, a limited partnership, in
11 an effort to collect its accounts receivable and enforce its
12 security interests which were securing the same. Please
13 include all transfers of accounts receivable to collection
14 agencies, credit bureaus and other persons. Please state the
15 amounts or a description of the property involved in each
16 case.
17
18
19

20 19. Please list all real estate and interests in real
21 estate which you acquired during the period from 1957 through
22 1972. As to each property please state the party from which
23 it was acquired, the purchase price, the nature of the
24 property, and the tenant to whom it was leased. Also
25 indicate if any part of the purchase price was borrowed from
26 Haig Berberian, a limited partnership.
27
28

1 20. Please list all personal property and equipment
2 which you leased to Haig Berberian, a limited partnership,
3 during the period from 1957 through 1972. As to each item
4 please indicate the date of acquisition by you, the acquisi-
5 tion price, your vendor, your source of funds of the purchase
6 price, the date on and rental at which it was leased to Haig
7 Berberian, a limited partnership.

8
9
10
11
12
13 21. For the period from 1957 through 1974, please list
14 all partnerships, ventures, corporations, trusts, proprietor-
15 ships and other businesses in which you had an interest and
16 indicate the nature of your interest.

17
18
19
20
21 22. For the period from 1957 through 1974, please list
22 all real property the title to which was held by another
23 person as your nominee. Please identify the name of your
24 nominee in each case.

1 23. For the period from 1957 through 1974, please list
2 all real property the title to which you held as nominee for
3 another person. Please identify the name of your principal
4 in each case.

5
6
7
8 24. For each year during the period from 1957 through
9 1972, with respect to Haig Berberian, a limited partnership,
10 please explain and furnish the documents which provide for
11 each of the following:

12
13 (a) The amount of cash and a description of and the
14 agreed value of the other property, if any, contributed by
15 each partner;

16
17
18
19 (b) The additional contributions, if any, agreed
20 to be made by each partner and the times at which or events
21 on the happening of which they were to be made;

22
23
24
25 (c) The time when the contribution of each
26 partner was to be returned;

1 (d) The share of the profits or the other
2 compensation by way of income which each partner was to
3 receive by reason of his contribution;

4
5
6
7 (e) The right, if given, of one or more of the
8 partners to priority over other partners, as to contributions
9 or as to compensation by way of income or as to withdrawal
10 of capital, and the nature of such priority;

11
12
13
14 (f) The right, if given, of a partner to demand
15 and receive property other than cash in return for his
16 contribution.

17
18
19
20 25. Please list all property which you ever leased to
21 Haig Berberian, a limited partnership, and include the date
22 on which you acquired the property, the date you leased the
23 property to Haig Berberian, a limited partnership, the terms
24 and conditions of the lease, and the date on and the price
25 for which the property was sold by you, if it was sold.

1 26. Please identify all of your bank accounts for the
2 period 1957 through 1974.

3
4
5
6
7 27. Please identify all assets which you sold to Pet
8 Inc. during the period 1972 through 1974 and the terms and
9 conditions of each sale.

10
11
12
13
14 28. Please state what ownership interest you ever had
15 in Sexton Nut Processors Inc., when you acquired the same,
16 from whom you acquired the interest, and at what price.

17
18
19
20 29. Please furnish copies of the annual balance sheet,
21 the profit and loss statement and the federal income tax
22 return for each year during the period from 1968 through
23 1983 for each of the following:

24
25 (a) Haig Berberian Corp.;

1 (b) Isabel Berberian Corp.;

2
3
4 (c) Sexton Nut Processors Inc.;

5
6
7 (d) Berberian Orchards.
8
9

10 30. Do you deny that you appropriated business oppor-
11 tunities from Haig Berberian, a limited partnership? If so,
12 state:
13

14 (a) Each and every fact upon which you base this
15 denial;
16

17
18 (b) The identity of each person having any knowl-
19 edge of facts evidencing, referring, or relating to your
20 denial, and specify the particular facts of knowledge known
21 by each such person;
22

23
24 (c) Identify with specificity any and all documents
25 evidencing, referring, or relating to your denial or to the
26 facts set forth above in subpart (a);
27
28

1 (d) Whether there exists any other evidence
2 which refers or relates in any way to your denial and, if so
3 identify all such other evidence.
4
5

6 31. Do you deny that you acquired partnership property
7 from Haig Berberian, a limited partnership, for less than
8 fair market value on the date of sale? If so, state:
9

10 (a) Each and every fact upon which you base this
11 denial;
12
13

14 (b) The identity of each person having any
15 knowledge of facts evidencing, referring, or relating to
16 your denial, and specify the particular facts or knowledge
17 known by each such person;
18
19

20 (c) Identify with specificity any and all documents
21 evidencing, referring, or relating to your denial or to the
22 facts set forth above in subpart (a);
23
24
25
26
27
28

1 (d) Whether there exists any other evidence which
2 refers or relates in any way to your denial and, if so,
3 identify all such other evidence.
4

5
6 32. Did you ever acquire partnership property from Haig
7 Berberian, a limited partnership, which you subsequently sold
8 at a profit? If so, state:

9
10 (a) A description of the property;

11
12
13 (b) The acquisition date and price;

14
15
16 (c) The sales date and price;

17
18
19 (d) The party to whom the property was sold.
20

21
22 33. Please state who was acting as certified public
23 accountant during the period from 1968 through 1974 for each
24 of the following:

25
26 (a) Haig Berberian, a limited partnership;
27
28

1 (b) Haig Berberian Corp.;

2
3
4 (c) Haig Berberian;

5
6
7 (d) Sexton Nut Processors, Inc.;

8
9
10 (e) Berberian Orchards;

11
12
13 (f) Isabel Berberian Corp.
14
15

16 34. Do you deny that you misappropriated partnership
17 money from Haig Berberian, a limited partnership, for your
18 own benefit? If so, state:

19
20 (a) Each and every fact upon which you base this
21 denial;

22
23
24 (b) The identity of each person having any
25 knowledge of facts evidencing, referring, or relating to
26 your denial, and specify the particular facts or knowledge
27 known by each such person;
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(c) Identify with specificity any and all documents evidencing, referring, or relating to your denial or to the facts set forth above in subpart (a);

(d) Whether there exists any other evidence which refers or relates in any way to your denial and, if so, identify all such other evidence.

35. Do you deny that you conspired with others to transfer or to cause to be transferred property from Haig Berberian, a limited partnership, to your fellow defendants without adequate consideration? If so, state:

(a) Each and every fact upon which you base this denial;

(b) The identity of each person having any knowledge of facts evidencing, referring, or relating to your denial, and specify the particular facts of knowledge known by each such person;

1 (c) Identify with specificity any and all
2 documents evidencing, referring, or relating to your denial
3 or to the facts set forth above in subpart (a);
4

5
6 (d) Whether there exists any other evidence which
7 refers or relates in any way to your denial, and, if so,
8 identify all such other evidence.
9

10
11 36. Please state who were the loan officers of Wells
12 Fargo Bank with whom you were dealing during the period
13 from 1957 through 1972.
14

15
16 37. Please state where you filed your federal income
17 tax returns for the period from 1957 through 1974.
18

19
20 38. Please state what business associations you have
21 ever had with Fred Luchessa or Angelo Luchessa. Identify
22 the type of business association, the subject matter, and
23 the time periods involved.
24

25
26 39. With respect to that certain real property
27 situated in Stanislaus County, California, located generally
28 on the south side of Bangs Avenue, west of McHenry Avenue,

1 please identify any ownership or security interest you have
2 ever had in it.

3
4
5 40. With respect to that certain real property situated
6 in the City of Modesto, Stanislaus County, California,
7 generally located on 9th Street between C and D Streets,
8 please identify any ownership or security interest you have
9 ever had in it. State the time when and price for which the
10 property was acquired.

11
12
13 41. Please state what business associations you have
14 ever had with Van Spronsen of Visalia, California. Identify
15 the type of business association, the subject matter, and
16 the time periods involved.

17
18
19 42. With respect to that certain real property
20 situated in Stanislaus County, California, generally
21 comprising approximately 280 acres on Claus Road, please
22 identify any ownership or security interest you have ever
23 had in it.

24
25
26 43. With respect to that certain real property
27 situated in Stanislaus County, California, commonly known as
28 the approximately 180 acre HAF Ranch on Kiernan Avenue,

1 please identify any ownership or security interest you have
2 ever had in it.

3
4
5 44. With respect to that certain real property situated
6 in Stanislaus County, California, commonly known as Tri-
7 County Ranches on Coffee Road, please identify any ownership
8 or security interest you have ever had in it.

9
10
11 45. What real property or interest therein did you
12 ever acquire from Cyrus O. Darpinian?

13
14
15 46. Please identify the location and custodian of the
16 books and records of Haig Berberian, a limited partnership.

17
18
19 47. Please state what business associations you have
20 ever had with K. Darpinian, Suren Darpinian and Ara
21 Darpinian of Modesto, California. Identify the type of
22 business association, any real estate involved, the subject
23 matter, and the time periods involved.

1 48. What real property or interest therein did you
2 ever acquire from K. Darpinian and Sons, Inc.?
3
4

5 49. With respect to that certain real property situated
6 in Stanislaus County, California, commonly known as the
7 Salsi Ranch on Sisk Road, Salida, California, please identify
8 any ownership or security interest you have ever had in it.
9
10

11 50. With respect to that certain real property situated
12 in Stanislaus County, California, commonly known as the
13 Hottel Ranch, 6142 Dale Road, Modesto, California, please
14 identify any ownership or security interest you have ever
15 had in it.
16
17

18 51. Please identify every property which you have ever
19 sold to Pet Incorporated, a Delaware corporation, or to Pet
20 Investment Co., a Delaware corporation.
21
22

23 52. With respect to that certain real property situated
24 in Stanislaus County, California, located generally at the
25 intersection of Coffee Road and Sylvan Avenue, Modesto,
26 please identify any ownership or security interest you have
27 ever had in it.
28

1
2 53. Please state what business associations you have
3 ever had with and what interests you have ever had in West
4 Coast Growers & Packers, Inc., Selma, California.
5
6
7

8 54. Please state what interests you have ever had in
9 Tri-Co Company, a California corporation, and in Tri-Co
10 Almonds, Inc., a California corporation. Identify when you
11 acquired your interest, the price, the source of funds for
12 the acquisition, and when you sold your interest and to whom
13 and the sales price.
14
15
16

17 55. Please list all real property which you have
18 acquired from Beard Land and Investment Company. Identify
19 the documents involved, the price, and the time of acquisition.
20
21
22

23 56. Please list all real property which you have
24 acquired from Modesto Terminal Company, a California
25 corporation. Identify the documents involved, the price, and
26 the time of acquisition.
27
28

1 57. Did you ever acquire Lot 2 of Griffin Tract from
2 Sunset Sternan Food Company? If yes, please identify the
3 transaction.

4
5
6 58. Do you deny that Isabel Berberian Corporation
7 acquired three warehouses on a twelve acre parcel at Modesto,
8 California? If so, state:

9
10 (a) Each and every fact upon which you base this
11 denial;

12
13
14
15 (b) The identity of each person having any knowledge
16 of facts evidencing, referring, or relating to your denial,
17 and specify the particular facts or knowledge known by each
18 such person;

19
20
21
22 (c) Identify with specificity any and all documents
23 evidencing, referring, or relating to your denial or to the
24 facts set forth above in subpart (a);

25
26
27
28 (d) Whether there exists any other evidence which

1 refers or relates in any way to your denial and, if so,
2 identify all such other evidence.

3
4
5 59. Do you deny that as of June 30, 1969, K. Darpinian
6 and Sons, Inc. had borrowed \$248,413.67 from Haig Berberian,
7 a limited partnership? If so, state:

8
9 (a) Each and every fact upon which you base this
10 denial;

11
12
13 (b) The identity of each person having any knowledge
14 of facts evidencing, referring, or relating to your denial,
15 and specify the particular facts or knowledge known by each
16 such person;

17
18
19 (c) Identify with specificity any and all documents
20 evidencing, referring, or relating to your denial or to the
21 facts set forth above in subpart (a);

22
23
24 (d) Whether there exists any other evidence which
25 refers or relates in any way to your denial and, if so,
26 identify all such other evidence.

1 60. How much did K. Darpinian and Sons, Inc. owe to
2 Haig Berberian, a limited partnership, on August 31, 1972?
3 Please explain what happened to this receivable, when it was
4 collected, compromised, written off, and by whom.

5
6
7 61. Please identify your ownership interest in
8 K. Darpinian and Sons, Inc.

9
10
11 62. Please identify any ownership interest you ever
12 had in the former Darpinian Ranch on Claus and Yosemite
13 Ranch in Stanislaus County, California. State when you
14 acquired such interest, how it was acquired, the purchase
15 price and all other particulars of the transaction.

16
17
18 63. Please identify any ownership interest you ever
19 had in a ranch in Visalia on which you placed a walnut
20 receiving station. State when you acquired such interest,
21 how it was acquired, the purchase price, and all other
22 particulars of the transaction.

23
24
25 64. Please identify the twenty-four receiving stations
26 operated by Haig Berberian, a limited partnership, in
27 California on October 1, 1968.
28

1 65. Please state what ownership interest you ever had
2 in Raquel, Inc. when you acquired the same, from whom you
3 acquired the interest and at what price.
4

5
6 66. With respect to that certain real property
7 situated in the County of Stanislaus, California, generally
8 located on the south side of Kiernan Avenue, between Toomes
9 and Zinfandel, a part of which was rezoned on August 8, 1981
10 by Tentative Map 81-02, please identify any ownership or
11 security interest you have ever had in it.
12

13
14 67. Please state what ownership interest you ever had
15 in Berberian Farms Corporation, when you acquired the same,
16 from whom you acquired the interest, and at what price.
17

18
19 68. Please identify any ownership interest you ever
20 had in the south 27.5 acres of the southeast 1/4 of the
21 southeast 1/4 of Section 20, Township 2 South, Range 9 East,
22 M.D.B.&M., commonly known as the southwest corner of Stewart
23 and McHenry Avenues, County of Stanislaus, California.
24 State when you acquired such interest, how it was acquired,
25 the purchase price, and all other particulars of the
26 transaction.
27
28

1 69. Please state what ownership interest you ever had in
2 Berberian Nut Company, when you acquired the same, from whom
3 you acquired the interest, and at what price.
4

5
6 70. Please state what business associations you have
7 ever had with Tony Tarlock of San Mateo, California.
8 Identify the type of business association, any real estate
9 involved, the subject matter, and the time periods involved.
10

11
12
13 71. Please state what business associations you have
14 ever had with Arthur Van Spronsen of Ripon, California.
15 Identify the type of business association, any real estate
16 involved, the subject matter, and the time periods involved.
17

18
19
20 72. Do you deny that in 1959 Isabel Berberian Corporation
21 acquired land and buildings from Haig Berberian, a limited
22 partnership, at book value? If so, state:
23

24 (a) Each and every fact upon which you base this
25 denial;
26
27
28

1 (b) The identity of each person having any knowledge
2 of facts evidencing, referring, or relating to your denial,
3 and specify the particular facts or knowledge known by each
4 such person;

5
6
7
8 (c) Identify with specificity any and all documents
9 evidencing, referring, or relating to your denial or to the
10 facts set forth above in subpart (a);

11
12
13
14 (d) Whether there exists any other evidence which
15 refers or relates in any way to your denial and, if so,
16 identify all such other evidence.

17
18
19 73. Do you deny that in 1969 Isabel Berberian Corporation
20 borrowed money from Haig Berberian, a limited partnership,
21 for the purpose of constructing buildings which were then
22 leased to Haig Berberian, a limited partnership? If so,
23 state:

24
25 (a) Each and every fact upon which you base this
26 denial;

1 (b) The identity of each person having any knowledge
2 of facts evidencing, referring, or relating to your denial,
3 and specify the particular facts or knowledge known by each
4 such person;

5
6
7 (c) Identify with specificity any and all documents
8 evidencing, referring, or relating to your denial or to the
9 facts set forth above in subpart (a);

10
11
12 (d) Whether there exists any other evidence which
13 refers or relates in any way to your denial and, if so,
14 identify all such other evidence.

15
16
17 74. With respect to that certain real property situated
18 in Stanislaus County, California, located generally near the
19 intersection of Old Oakdale Road and Marble Avenue, and
20 commonly known as the Coffee Ranch, please identify any
21 ownership or security interest you have ever had in it.

22
23
24 75. Please identify what real estate you acquired from
25 Frank Martin of Modesto, California, including time of
26 acquisition and purchase price.

1 76. Please identify your interest in the warehouse at
2 324-332 on 10th Street, Modesto, California. State when you
3 acquired an interest, for how much, and when you sold your
4 interest, and for how much.

5
6
7
8 77. With respect to the approximately 178 acres of
9 real property situated in Stanislaus County, California,
10 located generally at the intersection of Sylvan and Coffee
11 Roads, please identify any ownership interest you have ever
12 had in it, when you acquired the same, your purchase price,
13 when you sold your ownership interest or any part of it, and
14 the sales price.

15
16
17
18 78. With respect to that certain real property situated
19 in Merced County, California, located generally between
20 Bradbury and Golf Links Road, Griffith Avenue and the future
21 extension of Johnson Avenue, please identify any ownership
22 or security interest you have ever had in it.

23
24
25
26 79. With respect to the approximately 284 acres of real
27 property situated in Stanislaus County, California, located
28 generally between McClure and Claus Roads, Yosemite Boulevard

1 and Dry Creek, please identify any ownership or security
2 interest you have ever had in it.

3
4
5 80. Please identify what interest you have ever had in
6 Haig Berberian, Inc.

7
8
9 81. Please identify the approximately 2,000 acres of
10 almonds and walnuts and the 1,900 acres of other farm land
11 which you farmed in 1972.

12
13
14 82. Please identify your interest in Trico, a processing
15 firm in Chico, California. State when you acquired your
16 interest, for how much, when you sold your interest, and for
17 how much.

18
19
20 83. Do you deny that you were employed by Pet Inc. from
21 1972-1975 as president so that a part of the purchase price
22 could be paid to you as salary? If so, state:

23
24 (a) Each and every fact upon which you base this
25 denial;

26
27
28 (b) The identity of each person having any knowledge

1 of facts evidencing, referring, or relating to your denial,
2 and specify the particular facts or knowledge known by each
3 such person;

4
5
6
7 (c) Identify with specificity any and all documents
8 evidencing, referring, or relating to your denial or to the
9 facts set forth above in subpart (a);

10
11
12 (d) Whether there exists any other evidence which
13 refers or relates in any way to your denial and, if so,
14 identify all such other evidence.

15
16
17 84. Please identify your interest in Berberian Farms.
18 State when you acquired your interest, for how much, when you
19 sold your interest, and for how much.

20
21
22 85. Please identify all assets owned by Berberian Farms,
23 the date of acquisition of each, the vendor, and the purchase
24 price.

25
26
27 86. State the name of each person who participated in,
28 or supplied information for, the above answers to interroga-

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

tories, and identify each interrogatory for which such person participated in answering, or supplied information for.

87. In answering the foregoing interrogatories, have you complied with the definitions and instructions which precede them?

Dated: _____

LAW OFFICES OF
BELLI, DRIVON & BAKERINK

By _____
LAURENCE E. DRIVON
Attorney for Plaintiff

1 PROOF OF MAILING

2 I, the undersigned, hereby declare this 2 day of
3 October 2, 1984, at Stockton, California, under penalty
4 of perjury, under the laws of the State of California, that
5 the following statements are true and correct:

6 1. My business address is 215 North San Joaquin Street,
7 Stockton, California 95202. My mailing address is 215 North
8 San Joaquin Street, Stockton, California 95202. I am employed
9 in the City of Stockton, County of San Joaquin, State of
10 California. I am over eighteen years of age, and I am not a
11 party to the cause entitled upon the document to which I
12 hereinafter refer.

13 2. I served a copy of the annexed INTERROGATORIES
14 _____

15 upon the following named attorneys in said action by depositing
16 on 10/2/84, 1984 a true copy thereof in the United
17 States mail at Stockton, California, said copy being then
18 and there enclosed in a sealed envelope with the proper
19 postage thereon prepaid.

20 3. Said envelope was addressed as follows:

21 JAMES WIEZEL
22 2 Embarcadero Center
San Francisco, CA 94108

Steven B. Sacks
29th Floor - Hartford Bldg.
650 California St.
San Francisco, CA

23
24
25
26
27
28
SHERI L. NAVONE

Sheri L. Navone