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Attorneys for Defendant LiveView Technologies, Inc.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF SOLANO

11 MARK BAKER,

12 Plaintiff,

13 v.

14 GOGRIIS CORPORATION, JACK IN THE
15 BOX, INC., RT GOLDEN HILLS, LP,
16 LIVEVIEW TECHNOLOGIES, INC., and
17 Does 1-20,

18 Defendants.

Case No. CU25-06372

**DEFENDANT LIVEVIEW
TECHNOLOGIES, INC.'S RESPONSES
TO PLAINTIFF'S FORM
INTERROGATORIES—GENERAL
(SET ONE)**

Judge: Hon. Wendy G. Getty
Dept.: 8

Date Action Filed: July 10, 2025
Trial Date: Not Set

19
20 PROPOUNDING PARTY: MARK BAKER

21 RESPONDING PARTY: LIVEVIEW TECHNOLOGIES, INC.

22 SET NUMBER: FORM-GENERAL (SET ONE)

23 Defendant LiveView Technologies, Inc. (“Defendant” or “LVT”), by and through
24 undersigned counsel, hereby responds to Plaintiff Mark Baker’s (“Plaintiff” or “Baker”) General
25 Form Interrogatories, Set 1 to LiveView Technologies, Inc. (the “Requests”) as follows:

26 **PRELIMINARY STATEMENT**

27 As of the date of these responses, Defendant has not yet completed its investigation and
28 discovery in this action. Accordingly, all answers contained herein are based upon the

1 information and the documents that are presently available and specifically known to Defendant.
2 Defendant anticipates that further discovery, independent investigation, and legal research and
3 analysis may supply additional facts and/or establish entirely new facts, conclusions, and legal
4 assertions, all of which may lead to substantial additions to, changes in, and variations from the
5 answers set forth herein.

6 Defendant responds to the Requests as it interprets and understands them. Defendant
7 reserves the right to supplement its response if Defendant subsequently asserts an interpretation of
8 any Request that differs from Defendant's current understanding. The following responses and
9 objections are given without prejudice to Defendant's right to produce evidence and subsequently
10 discovered facts that Defendant may obtain. Accordingly, Defendant reserves the right to change
11 any and all answers herein as additional facts or documents are ascertained, analyses are made,
12 legal research is completed, and assertions are formulated.

13 The responses and objections contained herein are made in a good faith effort to supply as
14 much factual information as is presently known but should in no way be to the prejudice of
15 Defendant in relation to further discovery, research, or analysis. Defendant will supplement these
16 responses as appropriate pursuant to the California Rules of Civil Procedure.

17 **GENERAL OBJECTIONS**

18 This response is made solely for the purpose of, and in relation to, this action. The
19 response is given subject to all appropriate objections (including, but not limited to, objections
20 concerning competency, relevancy, materiality, propriety, and admissibility) that would require
21 the exclusion of any document demanded by Defendant. All such objections and grounds
22 therefore are reserved and may be interposed at the time of trial.

23 In addition to any specific objections that may be made to the separate requests as set
24 forth in each response below, Defendant objects generally to each request to the extent that it
25 seeks to elicit information subject to and protected by attorney-client privilege and/or the attorney
26 work product doctrine and/or other applicable privilege. Nothing contained herein is intended to
27 be or should be construed as a waiver of the attorney-client privilege, the attorney work product
28 doctrine.

1 Defendant objects to each request to the extent it is overly broad and unduly burdensome
2 and is not reasonably calculated to lead to the discovery of admissible evidence.

3 Defendant further objects to this set of Requests due to defective service, as it was served
4 electronically by Plaintiff, a party to this lawsuit.

5 Defendant's agreement to provide information responsive to a particular request should
6 not be construed to mean that Defendant has any such requested relevant, non-privileged
7 information in its possession, custody, or control.

8 Defendant reserves the right to amend, modify or otherwise revise, correct, supplement, or
9 clarify these objections and response.

10 The Preliminary Statement and all objections set forth above shall be deemed to be incorporated
11 in full into each response separately set forth below.

12 **FORM INTERROGATORIES—GENERAL (SET ONE)**

13 **INTERROGATORY NO. 17.1:** Is your response to each request for admission served
14 with these interrogatories an unqualified admission? If not, for each response that is not an
15 unqualified admission:

- 16 (a) state the number of the request;
- 17 (b) state all facts on which you base your response;
- 18 (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have
19 knowledge of those facts; and
- 20 (d) identify all DOCUMENTS and other tangible things that support your response and
21 state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT
22 or thing.

23 **RESPONSE:**

24 **Request for Admission No. 10:**

- 25 (a) Request for Admission No. 10 (ten)
- 26 (b) LVT denied a portion of this Request due to the ambiguities and confusion created by the
27 phrasing and definitions of this Request as noted in the objections. LVT also denied a
28 portion of this Request because it is unclear which specific LVT system Plaintiff is

1 referring to. LVT also denied a portion of this Request because Plaintiff’s definitions
2 suggest LVT is rejecting and targeting specific people and it is not. LVT is targeting
3 conduct equally—against anyone that may pose a threat of illegal conduct. LVT partially
4 denied this Request because the lights are not used to “prevent members of the public
5 from remaining in or entering a specific area” but instead to deter anyone in the area
6 equally from undertaking illegal conduct. It is literally shining a light to help keep the
7 public and employees safe.

8 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
9 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

10 (d) Any documents and tangible things supporting this response relate specifically to LVT’s
11 product and are in possession of LVT. LVT anticipates having documents such as those
12 detailing the purpose of the blue lights and their relation to efforts to deter illegal conduct.
13 LVT can be contacted for relevant documents through its counsel: Bryan Benard and
14 Sarah Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT
15 84101, (801) 799-5800.

16 **Request for Admission No. 11:**

17 (a) Request for Admission No. 11 (eleven)

18 (b) LVT bases its denial to this Request due to the ambiguities and confusion created by the
19 phrasing and definitions of this Request as noted in the objections. LVT also denied this
20 Request because it is unclear which specific LVT system Plaintiff is referring to. LVT
21 also denied this Request based on the following facts. The blue lights as part of the entire
22 security unit act as a deterrent to any illegal conduct. *In re Cox* specifically allows
23 businesses to establish reasonable regulations to exclude individuals for rational reasons
24 such as property damage, injury to others, or business disruption—all things that LVT’s
25 product properly supports. It is not arbitrary, but treats all patrons in an equal and identical
26 manner. Moreover, if Plaintiff is referring to *In re Cox* 3 Cal.3d 205, that case is
27 inapposite. That case dealt with a security guard who allegedly arbitrarily excluded
28 potential customers. LVT’s lights and products do not arbitrarily exclude anyone. They do

1 not prevent entrance by the public. Indeed, even Plaintiff could enter, even if he has light
2 sensitivity, by simply not looking at the light, avoiding parking next to the light, wearing
3 sunglasses or specialty glasses, or a hat, or several other minimal actions.

4 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
5 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

6 (d) Any documents and tangible things supporting this response relate specifically to LVT's
7 product and are in possession of LVT. LVT anticipates having documents such as those
8 detailing the purpose of the blue lights and their relation to efforts to deter illegal conduct.
9 LVT can be contacted for relevant documents through its counsel: Bryan Benard and
10 Sarah Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT
11 84101, (801) 799-5800.

12 **Request for Admission No. 12:**

13 (a) Request for Admission No. 12 (twelve)

14 (b) LVT denied this Request due to the ambiguities and confusion created by the phrasing and
15 definitions of this Request as noted in the objections. LVT also denied this Request
16 because it is unclear which specific LVT system Plaintiff is referring to. LVT also denied
17 this Request is based on a number of defective definitions. LVT could not answer this
18 Request as the terminology Plaintiff used is vague and ambiguous, rendering the Request
19 unanswerable. Specifically, this Request hinges on what Plaintiff calls a "ARBITRARY
20 DETERRENT," but LVT does not know and cannot tell from Plaintiff's definitions
21 precisely what constitutes a "DETERRENT," and specifically one that is qualified as
22 "ARBITRARY." The phrase "INTENTIONAL act" is also key to this Request, and
23 similarly, LVT is unable to determine Plaintiff's precise meaning of that phrase, and
24 therefore, cannot respond.

25 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
26 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

27 (d) Any documents and tangible things supporting this response relate specifically to LVT's
28 product and are in possession of LVT. LVT anticipates having documents such as those

1 detailing the purpose of the blue lights and their relation to deter illegal conduct. LVT can
2 be contacted for relevant documents through its counsel: Bryan Benard and Sarah Hafen,
3 Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101, (801)
4 799-5800.

5 **Request for Admission No. 13:**

6 (a) Request for Admission No. 13 (thirteen)

7 (b) LVT denied a portion of this Request due to the ambiguities and confusion created by the
8 phrasing and definitions of this Request as noted in the objections. LVT also denied a
9 portion of this Request because it is unclear which specific LVT system Plaintiff is
10 referring to. LVT denied a portion of this Request because Plaintiff's definitions suggest
11 LVT is rejecting and targeting specific people and it is not. LVT is targeting conduct
12 equally—against anyone that may pose a threat of illegal conduct. LVT denied this
13 Request because the lights are not used to “prevent members of the public from remaining
14 in or entering a specific area” but instead to deter anyone in the area equally from
15 undertaking illegal conduct. It is literally shining a light to help keep the public and
16 employees safe.

17 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
18 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

19 (d) Any documents and tangible things supporting this response relate specifically to LVT's
20 product and are in possession of LVT. LVT anticipates having documents such as those
21 containing information relating to the hardware, software, and technical support relating to
22 its products. LVT can be contacted for relevant documents through its counsel: Bryan
23 Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake
24 City, UT 84101, (801) 799-5800.

25 **Request for Admission No. 14:**

26 (a) Request for Admission No. 14 (fourteen)

27 (b) LVT denied a portion of this Request due to the ambiguities and confusion created by the
28 phrasing and definitions of this Request as noted in the objections. LVT also denied a

1 portion of this Request because it is unclear which specific LVT system Plaintiff is
2 referring to. LVT denied a portion of this Request because, as detailed in LVT's response,
3 LVT has the capability to remotely control some, but not all, lights remotely subject to the
4 direction of its clients who have bought or leased the system and control the system.
5 Plaintiff's Request seeks an admission that LVT can remotely control all blue LED lights.
6 This is not the case. Further, the remote capabilities of any given light depends on each
7 specific product. Different products have different capabilities. Therefore, LVT cannot
8 admit this Request.

9 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
10 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

11 (d) Any documents and tangible things supporting this response relate specifically to LVT's
12 product and are in possession of LVT. LVT anticipates having documents such as those
13 detailing LVT's capabilities to control the lights on its products remotely. LVT can be
14 contacted for relevant documents through its counsel: Bryan Benard and Sarah Hafen,
15 Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101, (801)
16 799-5800.

17 **Request for Admission No. 15:**

18 (a) Request for Admission No. 15 (fifteen)

19 (b) LVT denied this Request due to the ambiguities and confusion created by the phrasing and
20 definitions of this Request as noted in the objections. LVT also denied this Request
21 because it is unclear which specific LVT system Plaintiff is referring to. LVT has not
22 conducted this type of testing on the blue LED lights used in its products, and therefore
23 cannot admit this Request.

24 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
25 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

26 (d) Any documents and tangible things supporting this response relate specifically to LVT's
27 product and are in possession of LVT. LVT anticipates potentially having documents such
28 as those relating to risk categorization of the blue LED lights on LVT's products. LVT

1 can be contacted for relevant documents through its counsel: Bryan Benard and Sarah
2 Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101,
3 (801) 799-5800.

4 **Request for Admission No. 16:**

5 (a) Request for Admission No. 16 (sixteen)

6 (b) LVT denied this Request due to the ambiguities and confusion created by the phrasing and
7 definitions of this Request as noted in the objections. LVT also denied this Request
8 because it is unclear which specific LVT system Plaintiff is referring to. LVT has not
9 conducted this type of testing on the blue LED lights used in its products, and therefore
10 cannot admit this Request.

11 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
12 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

13 (d) Any documents and tangible things supporting this response relate specifically to LVT's
14 product and are in possession of LVT. LVT anticipates potentially having documents such
15 as those relating to risk categorization of the blue LED lights on LVT's products. LVT
16 can be contacted for relevant documents through its counsel: Bryan Benard and Sarah
17 Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101,
18 (801) 799-5800.

19 **Request for Admission No. 17:**

20 (a) Request for Admission No. 17 (seventeen)

21 (b) LVT denied this Request due to the ambiguities and confusion created by the phrasing and
22 definitions of this Request as noted in the objections. LVT also denied this Request
23 because it is unclear which specific LVT system Plaintiff is referring to. There are no
24 regulations requiring LVT to perform this type of testing, and therefore, LVT has no duty
25 to perform the testing described in this Request.

26 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
27 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.

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1 (d) Any documents and tangible things supporting this response relate specifically to LVT’s
2 product and are in possession of LVT. LVT anticipates potentially having documents such
3 as those relating to risk categorization of the blue LED lights on LVT’s products. LVT
4 can be contacted for relevant documents through its counsel: Bryan Benard and Sarah
5 Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101,
6 (801) 799-5800.

7 **Request for Admission No. 18:**

- 8 (a) Request for Admission No. 18 (eighteen)
- 9 (b) LVT denied this Request due to the ambiguities and confusion created by the phrasing and
10 definitions of this Request as noted in the objections. LVT also denied this Request
11 because it is unclear which specific LVT system Plaintiff is referring to. There are no
12 regulations requiring LVT to perform this type of testing, and therefore, LVT has no duty
13 to perform the testing described in this Request.
- 14 (c) Contact LVT, c/o Bryan Benard and Sarah Hafen, Holland & Hart LLP, 222 S. Main
15 Street, Suite 2200, Salt Lake City, UT 84101, (801) 799-5800.
- 16 (d) Any documents and tangible things supporting this response relate specifically to LVT’s
17 product and are in possession of LVT. LVT anticipates potentially having documents such
18 as those relating to risk categorization of the blue LED lights on LVT’s products. LVT
19 can be contacted for relevant documents through its counsel: Bryan Benard and Sarah
20 Hafen, Holland & Hart LLP, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101,
21 (801) 799-5800.

22 Dated: April 1, 2026

HOLLAND & HART LLP

23
24 By: /s/ Bryan Benard
Bryan Benard
Sarah A. Hafen
Courtney Thompson

25
26 *Attorneys for Defendant LiveView
27 Technologies, Inc.*

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VERIFICATION

I, Bryce Higbee, declare as follows:

I am the General Counsel of LiveView Technologies, Inc. I have read the foregoing **DEFENDANT LIVEVIEW TECHNOLOGIES, INC.’S RESPONSES TO PLAINTIFF’S FORM INTERROGATORIES—GENERAL (SET ONE)** and the factual parts of this response are true and correct to the best of my knowledge, except as to matters which are based on my information or belief, and as to such matters, I believe them to be true. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on the _____ day of _____, 2026 in American Fork, Utah.

LIVEVIEW TECHNOLOGIES, INC.

By: Bryce Higbee
Its: General Counsel

Holland & Hart LLP
222 South Main Street, Suite 2200
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PROOF OF SERVICE


I am a citizen of the United States. My business address is 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101. I am employed in the County of Salt Lake, where this service occurs. I am over the age of 18 years, and not a party to the within action.

On the date set forth below, according to ordinary business practice, I served the foregoing document(s) described as:

DEFENDANT LIVEVIEW TECHNOLOGIES, INC.'S RESPONSES TO FORM INTERROGATORIES—GENERAL (SET ONE)

- (BY FAX) I transmitted via facsimile, from facsimile number 801-799-5700, the document(s) to the person(s) on the attached service list at the fax number(s) set forth therein, on this date before 5:00 p.m. A statement that this transmission was reported complete and properly issued by the sending fax machine without error is attached to this Proof of Service.
- (BY E-MAIL) On this date, I personally transmitted the foregoing document(s) via electronic mail to the e-mail address(es) of the person(s) AS INDICATED on the attached service list.
- (BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed AS INDICATED to the person(s) on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.
- (BY PERSONAL SERVICE - AS INDICATED ON THE SERVICE LIST) On this date, I caused the above documents to be delivered by hand delivery to the person(s) below.
- (BY OVERNIGHT DELIVERY - AS INDICATED ON THE SERVICE LIST) On this date, I placed the documents in envelope(s) addressed to the person(s) on the attached service list, and caused those envelopes to be delivered to an overnight delivery carrier, with delivery fees provided for, for next-business-day delivery to whom it is to be served.
- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 1, 2026, at Salt Lake City, Utah.



Marilyn Christensen

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SERVICE LIST

Mark Baker mbaker@softlights.org mbaker@moonlightadvocacy.org	<i>Pro se Plaintiff</i>
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