

1 JOHN THOMAS CHRISTIANA
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4 By: John Thomas Christiana, Pro Se

5 SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

7
8 JOHN THOMAS CHRISTIANA)

9 Plaintiff,)

10 vs.)

11)
12 CITY OF LAGUNA BEACH, JASON)
13 FARRIS, COUNTY OF ORANGE,)
14 WILLIAM CRITTENDEN, And Does 1)
Through 10 Inclusive,)

15 Defendants.)
16)
17)

CASE NO. 30-2018-00975317-CU-NP-CJC
[Judge Sheila B. Fell]

PLAINTIFF JOHN THOMAS CHRISTIANA
SPECIAL INTERROGATORIES,
SET NO. ONE

Served Concurrently with Plaintiff's Request
For Production of Documents and Things,
Set No. One and Form Interrogatories.

Complaint filed: February 23, 2018
Trial Date: August 24, 2020
Department: C25

18 PROPOUNDING PARTY: JOHN THOMAS CHRISTIANA
19 RESPONDING PARTY: COUNTY OF ORANGE, WILLIAM CRITTENDEN,

20 SET NUMBER: ONE

21 TO: Defendants County of Orange, William Crittenden and all attorneys of record.
22

23 PLEASE TAKE NOTICE THAT pursuant to California Code of Civil Procedure section,
24 2030.030 et seq., Plaintiff John Thomas Christiana demands timely responses and answers to
25 Plaintiff's Special Interrogatories, Set No. One, being served on the RESPONDING PARTY,
26 written responses to the PROPOUNDING PARTY, and subscribed under oath within thirty days
27 of service hereof, separately and in writing admitting the genuineness of the responses. These
28

1 requests for admissions are being propounded on the grounds that each is relevant to the subject
2 matter of this action or is reasonably calculated to lead to the discovery of admissible evidence.

3 **INSTRUCTIONS**

4 1. Plaintiff John Thomas Christiana demands timely responses and answers to
5 Plaintiff's Special Interrogatories, Set No. One, and separately admitting the genuineness of the
6 responses, being served on the RESPONDING PARTY, written responses to the
7 PROPOUNDING PARTY, and subscribed under oath no more than thirty (30) days after service
8 of this Request including service if served in person or per California Code of Civil Procedure
9 §1013 may be extended by two court days, or 32 days, if served by overnight express mail.

10 2. California Code of Civil Procedure section, 2030.030 et seq. Special
11 Interrogatories may be satisfied by responding by mail to: John Thomas Christiana, 425 So. 2nd
12 Avenue, Unit 1277, Barstow, CA 92312.

13 3. Unless otherwise specified, these interrogatories are not limited in time period to
14 and including the date of service of these interrogatories.

15 4. Where knowledge, information, or documents are requested, such request
16 encompasses knowledge, information or documents in your possession, custody or control, or in
17 the possession, custody or control of your staff, agents, employees, representatives and, unless
18 privileged, attorneys, or any other person who has possession, custody or control of your
19 proprietary knowledge, information or documents.

20 5. For any interrogatory or part of an interrogatory which you refuse to answer under
21 a claim of privilege, submit a sworn or certified statement from your counsel or one of your
22 employees in which you identify the nature of the information withheld; specify the grounds of
23 the claimed privilege and the paragraph of these interrogatories to which the information is
24 responsive; and identify each person to whom the information, or any part, has been disclosed.

25 6. Answer each interrogatory fully. If you object to any interrogatory, state the
26 reasons for objection and answer to the extent the interrogatory is not objectionable. If you are
27 unable to answer an interrogatory fully, submit as much information as is available, explain why
28 your answer is incomplete, and identify or describe all other sources of more complete or
accurate information.

1 either directly or by translation through detection devices or readers; any such document is to be
2 produced in a reasonably legible and usable form. The term "document" includes all drafts of a
3 document and all copies that differ in any respect from the original, including any notation,
4 underlining, marking, or information not on the original. The term also includes information
5 stored in, or accessible through, computer or other information retrieval systems (including any
6 computer archives or back-up systems), together with instructions and all other materials
7 necessary to use or interpret such data compilations. Without limitation on the term "control" as
8 used in the preceding paragraph, a document is deemed to be in your control if you have the right
9 to secure the document or a copy thereof from another person.

10 2. As used herein, the terms "YOU" and "YOUR" refers to DEFENDANTS,
11 individually and collectively, and his or her, its or their affiliates and anyone acting on their, her
12 or its behalf, including, but not limited to, past and present officers, officials, directors, agents,
13 employees, representatives, affiliates, attorneys, accountants, investigators, or anyone else acting
14 in their, his or its interest, on their, her or its behalf, or at their, his or its request, and each of
15 them.

16 3. As used herein, "DEFENDANT" and "DEFENDANTS" refers to defendants'
17 COUNTY OF ORANGE, and WILLIAM CRITTENDEN.

18 4. As used herein, "PLAINTIFF" refers to JOHN THOMAS CHRISTIANA.

19 5. As used herein, "COMMUNICATION" or "COMMUNICATIONS" includes any
20 contacts between or among two or more PERSONS, and includes without limitation, written
21 contact by such means as letters, memoranda, telegrams, telexes, electronic mail or any other
22 DOCUMENTS, and oral contact by such means as face-to-face meetings and telephone
23 conversations. "COMMUNICATION" also means, unless otherwise specified, any of the
24 following: (a) any letter, memorandum or other document exchanged, received, or transmitted;
25 (b) any oral conversation between two to or more persons, whether such conversation was by
26 chance or pre-arranged, formal or informal, by telephone or in person; (c) any meeting between
27 two or more persons, whether such contact was by chance or pre-arranged, formal or informal,
28 or (d) any documentation summarizing or describing such document, exchange, oral
communication or meeting.

6. As used herein, "EVIDENCE" means and refers to testimony, material objects, or
other things presented to the senses that may be offered to prove the existence or nonexistence of

1 a fact, and all writings, and other things included in the original and any copy of any written,
2 recorded, filmed or graphic matter, whether produced or reproduced on papers, cards, tapes, film,
3 electronic facsimile, computer storage devices or any other media, including, but not limited to
4 writings, memoranda, notes, minutes, records, photographs, movies, video-tapes, audio
5 recordings, correspondence, telegrams, telexes, diaries, bookkeeping entries, financial
6 statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements,
7 notebooks, handwritten notes, plans, architectural drawings, applications, proposals, agreements,
8 books, pamphlets, articles, leaflets, appointment calendars, work papers, and notes, records and
9 recordings of oral conversations.

10 7. As used herein, the term "PERSON" means and refers to any natural person, firm,
11 entity, individual, company, corporation, organization, association, partnership, proprietorship,
12 joint venture, governmental agency, public entity, board, authority, commission, office or any
13 other entity, whether private, business, public, or governmental.

14 8. As used herein, "ABUSE" as used herein shall mean any act of harassment,
15 retaliation, discrimination, physical disability discrimination, perceived physical disability
16 discrimination, intimidation, ostracization, name-calling, slander, insult, humiliation, revenge,
17 and/or other abuse against PLAINTIFF by any of the NAMED DEFENDANTS, or by any of
18 their agents or employees, or by any combination of such persons, alleged in the COMPLAINT
19 or that PLAINTIFF intends to allege in this action at any hearing or at trial.

20 9. As used herein, "COMPLAINT" refers to the complaint filed by PLAINTIFF in
21 this case.

22 10. As used herein, the phrase "DESCRIBE IN DETAIL" as used in these
23 interrogatories includes a request for a complete description and explanation of the facts,
24 circumstances, analysis, opinion and other information relating to (as that phrase is defined
25 below) the subject matter of a specific interrogatory.

26 11. As used herein, the terms "RELATE TO," "RELATED TO," and/or "RELATING
27 TO" mean containing, constituting, considering, comprising, concerning, discussing, regarding,
28 describing, reflecting, studying, commenting or reporting on, mentioning, analyzing, or referring,
alluding, or pertaining to, in whole or in part, discuss, support, refute, reflect, mention, embody,
pertain to, involve, comprise, respond to, concern, contain, summarize, memorialize, evidence,
refer to, or connect in any way legally, factually or logically with, the matter therein.

1 12. As used herein, "IDENTIFY" or "IDENTITY" means to state or a statement of:
2 (a) in the case of a person other than a natural person, its name, the address of its principal place
3 of business (including zip code), its telephone number, and the name of its chief executive
4 officer, as well as, if it has a person other than a natural person that ultimately controls it, that
5 other person's name, the address of that person's principal place of business (including zip code),
6 that other person's telephone number, and the name of that other person's chief executive officer;
7 (b) in the case of a natural person, his or her name, business address and telephone number,
8 employer, and title or position; (c) in the case of a communication, its date, type (e.g., telephone
9 conversation or discussion), the place where it occurred, the identity of the person who made the
10 communication, the identity of the person who received the communication, the identity of each
11 other person when it was made, and the subject matter discussed; (d) in the case of a document,
12 the title of the document, the author, the title or position of the author, the addressee, each
13 recipient, the type of document, the subject matter, the date of preparation, and its number of
14 pages; and (e) in the case of an agreement, its date, the place where it occurred, the identity of all
15 persons who were parties to the agreement, the identity of each person who has knowledge of the
16 agreement and all other persons present when it was made, and the subject matter of the
17 agreement.

18 13. As used herein, the term "ANY" as well as "ALL" means one or more and shall
19 be construed to include "each" and "every" within their meanings.

20 14. As used herein, the terms "and" and "or" have both conjunctive and disjunctive
21 meanings so as to be inclusive of any documents which otherwise may be excluded from
22 production.

23 15. As used herein, "INCLUDING" means including, but not limited to.

24 16. As used herein, requests, the use of the singular includes the plural and the use of
25 the plural includes the singular, so as to be inclusive of any DOCUMENTS which may otherwise
26 be excluded from production. The singular form of a noun or pronoun shall be considered to
27 include within its meaning the plural form of the noun or pronoun, and vice versa; and the past
28 tense shall include the present tense where the clear meaning is not distorted. The term "or" shall
mean "and" and vice-versa, as necessary to bring within the scope of the following
interrogatories all information or documents that would be excluded absent this definition.

SPECIAL INTERROGATORIES

1 PLAINTIFF hereby demands that Defendants respond and answer Plaintiff’s SPECIAL
2 INTERROGATORIES, SET NO. ONE at the address noted above within 30 days of service,
3 which is 32 days total if served by overnight service, of this request.

4 **INTERROGATORY NO. 1**

5 Defendant County of Orange and William Crittenden, when were you first contacted to
6 investigate Plaintiff John Thomas Christiana (“Plaintiff”)?

7 **INTERROGATORY NO. 2**

8 Defendant County of Orange and William Crittenden, were you investigating Plaintiff
9 under California Welfare and Institutions Code section 5150?

10 **INTERROGATORY NO. 3**

11 Defendant County of Orange and William Crittenden, describe the supporting documents
12 you given regarding investigating Plaintiff?

13 **INTERROGATORY NO. 4**

14 Defendant County of Orange and William Crittenden, describe including dates and with
15 who, any meetings you have had discussing Plaintiff?

16 **INTERROGATORY NO. 5**

17 Defendant County of Orange and William Crittenden, what dates did you visit Plaintiff at
18 his residence in Laguna Beach, California?

19 **INTERROGATORY NO. 6**

20 Defendant County of Orange and William Crittenden, did you ask or imply to Plaintiff to
21 take psychotropic drugs for a mental illness?

22 **INTERROGATORY NO. 7**

23 Defendant County of Orange and William Crittenden, were you with Jason Farris at my
24 residence in Laguna Beach on February 14, 2017?

25 **INTERROGATORY NO. 8**

26 Defendant County of Orange and William Crittenden, on February 14, 2017 did you put a
27 key or anything into Plaintiff’s door lock or any locking mechanism?

28 **INTERROGATORY NO. 9**

 Defendant County of Orange and William Crittenden, on February 14, 2017 did you
observe Jason Farris put a key or anything into Plaintiff’s door lock or any locking mechanism?

1 **INTERROGATORY NO. 10**

2 Defendant County of Orange and William Crittenden, *are you aware* if Jason Farris put a
3 key or anything into Plaintiff’s door lock or any locking mechanism?

4 **INTERROGATORY NO. 11**

5 Defendant County of Orange and William Crittenden, if you have discussed this incident
6 with Jason Farris or anyone other than your attorney, what did you discuss?

7 **INTERROGATORY NO. 12**

8 Defendant County of Orange and William Crittenden, please describe if you are aware of
9 any abuse or specific treatment to Plaintiff different than other residents?

10 **INTERROGATORY NO. 13**

11 Defendant County of Orange and William Crittenden, why did you visit Plaintiff’s
12 mother? What was the date and what was discussed when you visited Plaintiff’s mother? Did
13 you advise Plaintiff’s mother that Plaintiff has a mental illness based on what?

14 **INTERROGATORY NO. 14**

15 Defendant County of Orange and William Crittenden, if you have contacted the City of
16 Huntington Beach, what was discussed with who?

17 **INTERROGATORY NO. 15**

18 Defendant County of Orange and William Crittenden, do you believe Plaintiff has a
19 mental illness based on what?

20 **INTERROGATORY NO. 16**

21 Defendant County of Orange and William Crittenden, do you believe Plaintiff is a danger
22 to himself or others based on what?

23 **INTERROGATORY NO. 17**

24 Defendant County of Orange and William Crittenden, please explain if you have you ever
25 wirelessly violated Plaintiff’s privacy or do you know if others have violated Plaintiff’s privacy?

26 **INTERROGATORY NO. 18**

27 Defendant County of Orange and William Crittenden, are you aware of any law, bill,
28 ordinance, document, guideline, rule, threat, intimidating factor, oral statement, or anything else
that prohibits you from answering any of the questions or answering these special interrogatories
truthfully? Please identify and explain.

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1 **INTERROGATORY NO. 19**

2 Defendant County of Orange and William Crittenden, are you allowed to lie on the above
3 question or this question on the basis of immunity, privilege, national security or implied
4 national security or anything related that you think prevents you from answering truthfully here
5 or in a court of law?

6 **INTERROGATORY NO. 20**

7 Defendant County of Orange and William Crittenden, to the best of your knowledge, are
8 the residents of the County of Orange allowed to speak freely to Plaintiff about any abuses or
9 wireless invasion of privacy that are happening to Plaintiff without fear of arrest, retaliation,
10 intimidation, harassment, ostracization, or anything of the sort, including undue wrongful
11 recourse or influence *because* they spoke freely to Plaintiff about the abuses or wrongful actions
12 that Plaintiff alleges are being done to him?

13 **INTERROGATORY NO. 21**

14 Defendant County of Orange and William Crittenden, are Plaintiff’s mother or family
15 members that live in the County of Orange allowed to freely speak to Plaintiff in any kitchen or
16 any house about the abuses or wrongful actions that Plaintiff alleges are being done to him,
17 without fear of arrest, retaliation, intimidation, harassment, ostracization, or anything of the sort,
18 including undue wrongful recourse or influence, *because* they spoke to Plaintiff about the
19 abuses?

20 **INTERROGATORY NO. 22**

21 Defendant County of Orange and William Crittenden, are you aware and explain if you
22 know of any experiment being done on Plaintiff?

23 **INTERROGATORY NO. 23**

24 Defendant County of Orange and William Crittenden, whether or not you were aware of
25 anything inserted, injected, or anything of the sort into Plaintiff, are you now aware of any
26 contrivance, apparatus, chip, device, object, anything manmade or anything not natural that has
27 been or is inserted, injected, or anything of the sort into Plaintiff?

28 **INTERROGATORY NO. 24**

Defendant County of Orange and William Crittenden, *if* you or anyone wirelessly
shocked, or any type of wireless administration, Plaintiff’s eyes, nerves, or any part or anything
of Plaintiff’s body, would you consider that assault or battery, otherwise known as abuse?

1 **INTERROGATORY NO. 25**

2 Defendant County of Orange and William Crittenden, *if* you or anyone wirelessly
3 shocked, or any type of wireless administration, Plaintiff’s penis or testicles or any part of
4 Plaintiff’s sex organs, would you consider that assault or battery or sex abuse?

5 **INTERROGATORY NO. 26**

6 Defendant County of Orange and William Crittenden, *if* you or any person violated
7 Plaintiff’s personal privacy via inside his head as he has alleged, would you say that you or that
8 any person should be considered a predator based on you or any person violating his personal sex
9 privacy and sex life?

10 **INTERROGATORY NO. 27**

11 Defendant County of Orange and William Crittenden, are you aware of any wireless
12 invasion of privacy or physical abuse to Plaintiff?

13 **INTERROGATORY NO. 28**

14 Defendant County of Orange and William Crittenden, did you answer or not answer all of
15 the aforementioned questions honestly without deceit and without concern, fear, threats, or
16 repercussions from anyone or any city, county, state, or federal agency and without any
17 immunity, classified, or privileged reasons to not answer or not answer truthfully?

18 Notice is hereby given that pursuant to California C.C.P 2030.290(a), failure to respond
19 and answer all of the above special interrogatories will result in judicial notice. This request is
20 based upon the all applicable statues and codes, as well as all oral and documentary information
21 on file or presented at any proceedings.

22 Respectfully submitted,

23 DATED: February 29, 2020

24 _____
25 John Thomas Christiana
26 Plaintiff in Pro Per
27
28