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14 Attorneys for Plaintiff JANE DOE

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF LOS ANGELES**

17 JANE DOE, an Adult Individual Suing Under  
18 Anonymity Due to Privacy and Safety,

19 Plaintiff,

20 vs.

21 ALKIVIADES DAVID, an Individual, a.k.a.  
22 ALKI DAVID; HOLOGRAM USA, INC., a  
23 California Corporation, a.k.a. HOLOGRAM  
24 USA PRODUCTIONS, INC., HOLOGRAM  
25 USA ENTERTAINMENT, INC., FILMON.TV,  
26 INC., FILMON.TV NETWORKS, INC. and  
27 FILMON.TV LA, INC.; SWISSX LABS AG,  
28 INC. a California Corporation, a.k.a. SWISSX  
LOUNGE and FILMONTV UK, LTD; and  
DOES 1 through 150, inclusive,

Defendants.

Case No.: 20STCV37498

(Assigned for all purposes to the Honorable  
Christopher L. Lui in Dept. 76)

**PLAINTIFF JANE DOE'S JUDGMENT  
DEBTOR INTERROGATORIES TO  
DEFENDANT ALKIVIADES DAVID  
PURSUANT TO CODE. CIV. PROC. §  
708.020**

**(SET ONE)**

Action Filed: September 30, 2020

Trial: June 13, 2024

**PROPOUNDING PARTY: PLAINTIFF, AVA CHRUNIAK**

**RESPONDING PARTY: DEFENDANT, SOLE ADDICTS LLC**

**SET NUMBER: ONE**

1 Pursuant to California Code of Civil Procedure sections 708.010, et seq. and 2030.010, et  
2 seq., Plaintiff JANE DOE hereby propounds the following Judgment Debtor Interrogatories to  
3 Defendant ALKIVIADES DAVID as set forth below. Plaintiff JANE DOE requests that Defendant  
4 ALKIVIADES DAVID serve a written response, subscribed under oath, within thirty (30) days  
5 after the service of this request at the office of The Dordick Law Corporation, located at 1122  
6 Wilshire Boulevard, Los Angeles, CA 90017.

7  
8 **DEFINITIONS**

9 Words in CAPITALS are defined as follows:

10 1. **“YOU”** and **“YOUR”** as used herein, includes and collectively refers to Defendant  
11 ALKIVIADES DAVID, including Defendant ALKIVIADES DAVID's agents, representatives,  
12 investigators, employees, contractors, insurance companies, third-party adjusting administrators,  
13 as well as said entities' predecessors in interest, their agents, their employees, their investigators,  
14 their representatives, their insurance companies, and anyone else acting on behalf of Defendant  
15 ALKIVIADES DAVID, save for his attorneys.

16 2. **“PERSON(S)”** as used herein, shall refer to, mean and include any natural person  
17 or firm, association, organization, partnership, business, trust, corporation, public agency and/or  
18 other form of entity.

19 3. **“PLAINTIFF”** means and refers to Plaintiff Jane Doe in the above-entitled action.

20 4. **“COMPLAINT”** means and refers to the civil complaint for damages filed by  
21 PLAINTIFF on September 30, 2020, in the Superior Court of State of California for the County  
22 of Los Angeles, Case No. 20STCV37498, giving rise to this action.

23 5. **“INCIDENT”** or **“SUBJECT INCIDENT”** means and refers to the events, facts  
24 and circumstances giving rise to this action and as described in the COMPLAINT.

25 6. **“COMMUNICATION(S)”** mean(s) and refer(s) to any transmission of  
26 information by any means, including but not limited to, telephone, letters, telegrams, teletypes,  
27 telexes, telecopies, computer linkups, electronic mail, written memoranda, text messages, social  
28 media messages, and face-to-face statements or conversations.

1           7.       “**RELATE**,” “**REFER**,” “**REGARD**,” “**EVIDENCE**,” and/or any version thereof,  
2 means to evidence, support, memorialize, refer, constitute, contain, discuss, describe, embody,  
3 reflect, identify, mention, state, or otherwise relate in any way, in whole or in part.

4           8.       “**IDENTIFY**” as used in connection with **PERSONS** shall mean to provide the  
5 **PERSON**’s name, address, and telephone number.

6           9.       “**FINANCIAL ACCOUNT(S)**” means and refers to any accounts where financial  
7 institutions hold assets on behalf of a customer including but not be limited to any checking  
8 accounts, savings accounts, money market accounts, certificates of deposit, individual retirement  
9 accounts, joint accounts, business accounts, student accounts, minor accounts, 401(k) accounts,  
10 brokerage accounts, and other similar financial accounts. “**FINANCIAL ACCOUNT(S)**” shall also  
11 include any accounts holding cryptocurrencies or other digital assets or currencies.

12           10.      “**IDENTIFY**” as used in connection with and/or in reference to **FINANCIAL**  
13 **ACCOUNTS** means to describe the account in sufficient detail by providing the account number,  
14 the name of the financial institution where the account is held, the type of account, the current  
15 balance, and the last four digits of the account number.

16           11.      “**BUSINESS(ES)**” means and refers to any business, firm, association,  
17 organization, partnerships, or corporation.

18           12.      “**IDENTIFY**” as used in connection with and/or in reference to any business entity  
19 (including but not limited to any firm, association, organization, partnership, business, trust,  
20 corporation, public agency and/or other form of entity) means to provide the full legal name of the  
21 business, all fictitious business names (DBAs), the type of business entity (e.g., sole proprietorship,  
22 partnership, corporation, LLC), the business address, the nature of the business, the dates of  
23 operation, YOUR ownership interest or role in the business, and the state in which the business is  
24 registered or incorporated.

25           13.      “**IDENTIFY**” as used in connection with and/or in reference to real property means  
26 to provide the complete street address and/or PO box, parcel number (if known), type of property  
27 (e.g., residential, commercial, vacant land), the date of acquisition, the manner in which title is  
28 held, any co-owners or co-tenants, the current estimated value, the nature of YOUR interest in the

1 property, and whether the property is subject to any mortgage, lien, or other encumbrance.

2 14. “**FINANCIAL INSTRUMENT(S)**” means and refers to any security and/or  
3 contract that represents either an asset, a liability, or an equity instrument, including but not limited  
4 to stocks, bonds, options, futures, swaps, loans, derivatives, promissory notes, mortgages, or  
5 similar financial instruments.

6 15. “**IDENTIFY**” as used in connection with and/or in reference to FINANCIAL  
7 INSTRUMENTS means to provide a detailed description including the type of FINANCIAL  
8 INSTRUMENT, the name of the issuing entity or debtor, the account or certificate number (if  
9 applicable), the number of shares or principal amount, the current or most recent value, the date of  
10 acquisition, and the name(s) in which the FINANCIAL INSTRUMENTS are held.

11 16. “**IDENTIFY**” as used in connection with and/or in reference to possessions or  
12 assets, including but not limited to art, jewelry, collectibles, luxury goods, motor vehicles,  
13 recreational vehicles or similar personal property, means to provide a detailed description of each  
14 item, including the make, model, year, vehicle identification number (VIN) or serial number (if  
15 applicable), dates of ownership or lease, nature of YOUR financial interest (e.g., ownership, lease,  
16 lienholder, etc.), current location of the item, and whether the item is subject to any lien, loan, or  
17 other encumbrance.

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19 **JUDGMENT DEBTOR INTERROGATORIES**

20 **(SET ONE)**

21  
22 **SPECIAL INTERROGATORY NO. 1:**

23 IDENTIFY all YOUR residence addresses for the past ten (10) years.

24 **SPECIAL INTERROGATORY NO. 2:**

25 IDENTIFY all FINANCIAL ACCOUNTS held by YOU individually, jointly with any  
26 other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10)  
27 years.

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1 **SPECIAL INTERROGATORY NO. 3:**

2 IDENTIFY all BUSINESSES in which YOU currently maintain any ownership interest.

3 **SPECIAL INTERROGATORY NO. 4:**

4 IDENTIFY all BUSINESSES in which YOU maintained any ownership interest during the  
5 past ten (10) years.

6 **SPECIAL INTERROGATORY NO. 5:**

7 IDENTIFY all YOUR current sources of income and/or compensation, including the  
8 amounts of income provided by each source.

9 **SPECIAL INTERROGATORY NO. 6:**

10 IDENTIFY all YOUR sources of income and/or compensation during the past ten (10)  
11 years, including the amounts of income provided by each such source.

12 **SPECIAL INTERROGATORY NO. 7:**

13 IDENTIFY all trusts for which YOU are currently or have been a beneficiary during the  
14 past ten (10) years.

15 **SPECIAL INTERROGATORY NO. 8:**

16 IDENTIFY all trusts for which YOU are currently or have been a trustee during the past  
17 ten (10) years.

18 **SPECIAL INTERROGATORY NO. 9:**

19 IDENTIFY all FINANCIAL ACCOUNTS maintained by YOU individually, jointly with  
20 any other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past  
21 (10) years.

22 **SPECIAL INTERROGATORY NO. 10:**

23 IDENTIFY all FINANCIAL INSTRUMENTS owned by YOU individually, jointly with  
24 any other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past  
25 (10) years.

26 **SPECIAL INTERROGATORY NO. 11:**

27 IDENTIFY all real property or real estate owned by YOU individually, jointly with any  
28 other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10)

1 years.

2 **SPECIAL INTERROGATORY NO. 12:**

3 IDENTIFY each member, director, and/or officer of FILMON.TV, INC. during the last ten  
4 (10) years.

5 **SPECIAL INTERROGATORY NO. 13:**

6 IDENTIFY each member, director, and/or officer of HOLOGRAM USA  
7 ENTERTAINMENT, INC. during the last ten (10) years.

8 **SPECIAL INTERROGATORY NO. 14:**

9 IDENTIFY each member, director, and/or officer of HOLOGRAM USA, INC. during the  
10 last ten (10) years.

11 **SPECIAL INTERROGATORY NO. 15:**

12 IDENTIFY each member, director, and/or officer of SWISSX LOUNGE AG, INC. a.k.a  
13 SWISSX LOUNGE during the last ten (10) years.

14 **SPECIAL INTERROGATORY NO. 16:**

15 IDENTIFY each member, director, and/or officer of FILMONTV UK, LTD during the last  
16 ten (10) years.

17 **SPECIAL INTERROGATORY NO. 17:**

18 IDENTIFY all real property in which YOU maintained any ownership interest, in any  
19 manner, during the past ten (10) years.

20 **SPECIAL INTERROGATORY NO. 18:**

21 IDENTIFY all motor vehicles and/or recreational vehicles YOU owned, leased, or have  
22 had a financial interest in during the last ten (10) years.

23 **SPECIAL INTERROGATORY NO. 19:**

24 IDENTIFY all watercrafts and/or aircrafts YOU owned, leased, or have had a financial  
25 interest in during the last ten (10) years.

26 **SPECIAL INTERROGATORY NO. 20:**

27 IDENTIFY all intellectual property in which YOU currently have or have had any  
28 ownership or other interest during the last ten (10) years.

1 **SPECIAL INTERROGATORY NO. 21:**

2 IDENTIFY all businesses, corporations, partnerships, LLCs, or sole proprietorships in  
3 which YOU currently have any ownership or financial interest.

4 **SPECIAL INTERROGATORY NO. 22:**

5 IDENTIFY all businesses, corporations, partnerships, LLCs, or sole proprietorships in  
6 which YOU have had any ownership interest during the last ten (10) years.

7 **SPECIAL INTERROGATORY NO. 23:**

8 IDENTIFY each safety deposit box used by YOU, specifying (1) the banking institution  
9 where it is located; (2) in whose name it is listed; (3) how it is numbered or otherwise identified;  
10 and (4) its contents (including ownership and value of the contents).

11 **SPECIAL INTERROGATORY NO. 24:**

12 IDENTIFY any judgments, garnishments, or liens that have been entered against YOU in  
13 the last five (5) years.

14 **SPECIAL INTERROGATORY NO. 25:**

15 IDENTIFY all PERSON(S) from which YOU currently expect to receive any inheritance,  
16 trust disbursement, settlement, account receivable, rent receivable, or other monetary disbursement  
17 or payment during the next ten (10) years.

18 **SPECIAL INTERROGATORY NO. 26:**

19 State the expected time frames in which YOU anticipate receiving any inheritance, trust  
20 disbursement, settlement, account receivable, rent receivable, or other monetary payments from  
21 any PERSON during the next ten (10) years.

22 **SPECIAL INTERROGATORY NO. 27:**

23 IDENTIFY all accountants, financial advisors, certified public accountants, and/or tax  
24 advisors with whom YOU consulted during the past ten (10) years.

25 **SPECIAL INTERROGATORY NO. 28:**

26 IDENTIFY each corporate stock YOU owned in the last ten (10), including the stock's  
27 name and the number of shares YOU own.

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1 **SPECIAL INTERROGATORY NO. 29:**

2 IDENTIFY all mortgages, promissory notes, judgments, copyrights, or patents YOU  
3 owned or possessed during the last ten (10).

4 **SPECIAL INTERROGATORY NO. 30:**

5 IDENTIFY all United States bonds YOU owned during the last ten (10) years including its  
6 denomination, type, serial number, and value.

7 **SPECIAL INTERROGATORY NO. 31:**

8 State whether YOU currently possess any cash outside of a bank, including the total  
9 amount(s) and location(s) of such cash.

10 **SPECIAL INTERROGATORY NO. 32:**

11 State whether YOU have borrowed against any life insurance policies, specifically stating  
12 the name of the insurer, the policy number, the amount borrowed, and the date(s) of such  
13 borrowing.

14 **SPECIAL INTERROGATORY NO. 33:**

15 State the name and address of all YOUR current creditors, the amount(s) owed to each  
16 creditor, and whether they have any liens or encumbrances on any of YOUR assets or properties.

17 **SPECIAL INTERROGATORY NO. 34:**

18 State the present value, description and location of all real and personal assets transferred  
19 by YOU to YOUR children during the last ten (10) years, and the consideration paid for each such  
20 transfer.

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**SPECIAL INTERROGATORY NO. 35:**

IDENTIFY all art, jewelry, collectibles, and/or other luxury goods, with market values exceeding \$500, currently owned, in whole or in part, or possessed by YOU.

DATED: July 17, 2025

DORDICK LAW CORPORATION

By:   
\_\_\_\_\_  
Dustin Z. Moaven, Esq.  
Gary A. Dordick, Esq  
Brittney Ghadoushi, Esq.  
Attorneys for Plaintiff



1 ( ) **BY PERSONAL SERVICE.** I caused such documents to be delivered personally  
2 delivered to the persons addresses listed below.

3 ( ) For a party represented by an attorney, delivery was made to the attorney  
4 or at the attorney's office by leaving the documents, in an envelope or  
5 package clearly labeled to identify the attorney being served, with a  
6 receptionist or an individual in charge of the office, between normal  
business hours.

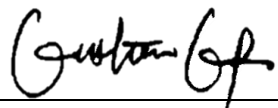
7 ( ) For a party, delivery was made to the party or by leaving the documents at  
8 the party's residence with some person not younger than 18 years of age  
9 between normal business hours.

10 ( ) **BY FAX TRANSMISSION.** I caused all of the pages of the above-entitled  
11 document to be sent to the recipients noted on the attached service list via  
12 electronic transfer (FAX) at the respective FAX numbers pursuant to C.C.P.  
13 §1013(e) from DORDICK LAW CORPORATION on the date set forth above.  
The machine I used complied with California Rules of Court, Rule 2.306(h)(3)  
and no error was reported by the machine.

14 (X) **BY ELECTRONIC SERVICE [E-MAIL]** Based on a court order or an  
15 agreement of the parties to accept service by e-mail or electronic transmission, I  
16 caused the document(s) to be sent from e-mail address  
17 [Gustavo.gonzalez@dordicklaw.com](mailto:Gustavo.gonzalez@dordicklaw.com) to the persons at the e-mail addresses listed  
18 in the Service List. I did not receive, within a reasonable time after the  
transmission, any electronic message or other indication that the transmission was  
unsuccessful.

19  
20 Executed on July 17, 2025, at Los Angeles, California.

21 I declare under penalty of perjury under the laws of the State of California that the above is true  
22 and correct.

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26 GUSTAVO GONZALEZ-RAMOS

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**SERVICE LIST**

*Jane Doe v. Alki David, et al.*

**Case No: 20STCV37498**

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*Attorney for Defendants, ALKIVIADES DAVID, FILMON.TV, INC., FILMON.TV LA, INC., FILMON.TV NETWORKS, INC., HOLOGRAM USA ENTERTAINMENT, INC., HOLOGRAM USA INC., A.K.A. HOLOGRAM USA PRODUCTIONS, INC. A.K.A. HOLOGRAM USA ENTERTAINMENT, INC., A.K.A. FILMON.TV, INC. AKA FILMON.TV NETWORKS, INC., AKA FILMON.TV LA, INC., SWISSX LABS AG, INC. A.K.A. SWISSX LOUNGE A.K.A. FILMONTV UK, LTD.*