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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 REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
DEFENDANT ALKIVIADES DAVID**

**(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 the provisions of California Code of Civil Procedure sections 708.030 et seq.  
2 and 2031.010, et seq., Plaintiff JANE DOE hereby propounds the following Judgment Debtor  
3 Requests for Production to Defendant ALKIVIADES DAVID as set forth below. Plaintiff hereby  
4 requests that Defendant ALKIVIADES DAVID serve a written response, subscribed under oath,  
5 and produce all responsive documents within thirty (30) days after the service of this Request at  
6 the office of the Dordick Law Corporation, located at 1122 Wilshire Boulevard, Los Angeles, CA  
7 90017.

8 If any covered by the terms of a request is claimed to be protected by any privilege, then,  
9 so to each such document, you shall identify the document by title, author, date, recipient, and  
10 general subject matter, with enough specificity for a proper determination of the claim of privilege  
11 to be made. A representation of inability to comply with the particular demand for inspection  
12 shall affirm that a diligent search and a reasonable inquiry has been made in an effort to comply  
13 with that demand. This statement shall also specify whether the inability to comply is because the  
14 particular item or category has never existed, has been destroyed, lost, misplaced, or stolen, or  
15 never has been, or is no longer, in the possession, custody, or control of the responding party. The  
16 statement shall set forth the name and address of any person or organization known or believed by  
17 that party to have possession, custody, or control of that item or category of item.

### 18 DEFINITIONS

19 Words in CAPITALS are defined as follows:

20 1. "YOU" and "YOUR" as used herein, includes and collectively refers to Defendant  
21 ALKIVIADES DAVID, including Defendant ALKIVIADES DAVID's agents, representatives,  
22 investigators, employees, contractors, insurance companies, third-party adjusting administrators,  
23 as well as said entities' predecessors in interest, their agents, their employees, their investigators,  
24 their representatives, their insurance companies, and anyone else acting on behalf of Defendant  
25 ALKIVIADES DAVID, save for his attorneys.

26 2. "PERSON(S)" as used herein, shall refer to, mean and include any natural person  
27 or firm, association, organization, partnership, business, trust, corporation, public agency and/or  
28

1 other form of entity.

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

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

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

8 6. “**YOUR BUSINESSES**” as used herein, includes and collectively refers to each  
9 and every legal entity owned and operated by YOU and/or that YOU once owned and/or operated,  
10 including but not limited to Defendants FILMON.TV, INC., HOLOGRAM USA  
11 ENTERTAINMENT, INC., HOLOGRAM USA, INC., and SWISSX LOUNGE AG, INC. a.k.a  
12 SWISSX LOUNGE and FILMONTV UK, LTD, and said entities' subsidiaries, parent/holding  
13 companies, agents, representatives, investigators, employees, contractors, insurance companies,  
14 third-party adjusting administrators, as well as said entities' predecessors in interest, their agents,  
15 their employees, their investigators, their representatives, their insurance companies, and anyone  
16 else acting on behalf of YOUR BUSINESSES, save for said entities' attorneys.

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

21 8. “**DOCUMENT(S)**” mean(s) and refer(s) to a writing as defined in Evidence Code  
22 Section 250. It shall also include any COMMUNICATION, handwriting, typewriting, printing,  
23 Photostating, photographing, every other means of recording, upon any tangible thing, and any  
24 form of COMMUNICATION or representation, including letters, words, pictures, signs, or  
25 symbols, or combinations thereof, written or graphic material of every kind and description,  
26 however produced or reproduced, whether draft, proposed or final, original or reproduction, and  
27 includes, without limitation, correspondence, hard copies of email, agreements, evaluations,  
28 estimates, studies, reports of site visits and other reports, analyses, drawings, graphs, charts,

1 photographs, phono-records, contracts, letters, memoranda, notes, laboratory notebooks, research  
2 reports, “protocols,” telexes, facsimiles, recorded phone messages, meeting agendas, meeting  
3 minutes, notes of communications, dictation, electronic or electromagnetic recordings,  
4 appointment books, calendars, diaries, accounting books, ledgers and records, invoices, purchase  
5 orders, checks, vouchers, expense reports, money orders and receipts, forms, templates, and  
6 manuals and information stored in or for use in a computer. The term “DOCUMENT(S)” shall  
7 further include the originals and each copy of each DOCUMENT if the copy contains any  
8 additional writing or is not an identical copy (without change or interlineation) of the original.

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

12       10.    **“ELECTRONICALLY STORED INFORMATION”** or **“ESI”** is defined as it is  
13 under California Code of Civil Procedure section 2033.010 or “information that is stored in an  
14 electronic medium” with “electronic” relating to technology having electrical, digital, magnetic,  
15 wireless, optical, electromagnetic, or similar capabilities.

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

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

26       13.    **“BUSINESS(ES)”** means and refers to any business, firm, association,  
27 organization, partnerships, or corporation.

28 ///

1 **REQUESTS FOR PRODUCTION**

2 **(SET ONE)**

3  
4 **REQUEST FOR PRODUCTION NO. 1:**

5 All DOCUMENTS EVIDENCING any FINANCIAL ACCOUNTS maintained by YOU  
6 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
7 benefit during the past (10) years.

8 **REQUEST FOR PRODUCTION NO. 2:**

9 All DOCUMENTS EVIDENCING any FINANCIAL INSTRUMENTS held by YOU  
10 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
11 benefit during the past (10) years.

12 **REQUEST FOR PRODUCTION NO. 3:**

13 All DOCUMENTS EVIDENCING any ownership interest YOU maintained in any  
14 BUSINESSES during the past ten (10) years.

15 **REQUEST FOR PRODUCTION NO. 4:**

16 All DOCUMENTS EVIDENCING YOUR current sources of income and/or compensation.

17 **REQUEST FOR PRODUCTION NO. 5:**

18 All DOCUMENTS EVIDENCING YOUR sources of income and/or compensation during  
19 the past ten (10) years.

20 **REQUEST FOR PRODUCTION NO. 6:**

21 All DOCUMENTS EVIDENCING all trusts for which are currently or have been a  
22 beneficiary or trustee during the past ten (10) years.

23 **REQUEST FOR PRODUCTION NO. 7:**

24 All DOCUMENTS EVIDENCING all real property or real estate owned by YOU  
25 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
26 benefit during the past (10) years.

27 **REQUEST FOR PRODUCTION NO. 8:**

28 All DOCUMENTS EVIDENCING any mortgage statements RELATED TO any real

1 property YOU owned during the past ten (10) years.

2 **REQUEST FOR PRODUCTION NO. 9:**

3 All DOCUMENTS EVIDENCING any tax bills RELATED TO any real property YOU  
4 own or have owned within the past ten (10) years.

5 **REQUEST FOR PRODUCTION NO. 10:**

6 All DOCUMENTS EVIDENCING any trust, estate, or inheritance from which YOU  
7 expect to receive funds, property or assets during the next ten (10) years.

8 **REQUEST FOR PRODUCTION NO. 11:**

9 All DOCUMENTS RELATED TO any loan application(s) submitted by YOU, or any other  
10 PERSON on YOUR behalf, to any bank, credit union, or lender during the past ten (10) years.

11 **REQUEST FOR PRODUCTION NO. 12:**

12 All DOCUMENTS RELATED TO any credit application(s) submitted by YOU, or any  
13 other PERSON on YOUR behalf, to any bank, credit union, or lender in the past ten (10) years.

14 **REQUEST FOR PRODUCTION NO. 13:**

15 All DOCUMENTS EVIDENCING any stocks YOU owned during the last ten (10) years,  
16 including but not limited to account statements, certificates, or transaction records.

17 **REQUEST FOR PRODUCTION NO. 14:**

18 All DOCUMENTS EVIDENCING any bonds or promissory notes YOU owned in the past  
19 ten (10) years.

20 **REQUEST FOR PRODUCTION NO. 15:**

21 All DOCUMENTS EVIDENCING any mortgages, promissory notes, or judgments YOU  
22 possessed in the past ten (10) years.

23 **REQUEST FOR PRODUCTION NO. 16:**

24 All DOCUMENTS EVIDENCING any copyrights, patents, or other intellectual property  
25 rights owned by YOU, or by any other PERSON on YOUR behalf or for YOUR benefit, during  
26 the past ten (10) years.

27 **REQUEST FOR PRODUCTION NO. 17:**

28 All DOCUMENTS RELATING to any United States bonds YOU owned during the past

1 ten (10) years.

2 **REQUEST FOR PRODUCTION NO. 18:**

3 All DOCUMENTS EVIDENCING ownership of any automobile(s) by YOU, or by any  
4 other PERSON on YOUR behalf or for YOUR benefit, during the past ten (10) years.

5 **REQUEST FOR PRODUCTION NO. 19:**

6 All DOCUMENTS EVIDENCING ownership of any watercrafts by YOU, or by any other  
7 PERSON on YOUR behalf or for YOUR benefit, during the past ten (10) years.

8 **REQUEST FOR PRODUCTION NO. 20:**

9 All DOCUMENTS EVIDENCING ownership of any aircrafts by YOU, or by any other  
10 PERSON on YOUR behalf or for YOUR benefit, during the last ten (10) years.

11 **REQUEST FOR PRODUCTION NO. 21:**

12 All DOCUMENTS RELATING to any safety deposit box held or accessed by YOU during  
13 the past ten (10) years.

14 **REQUEST FOR PRODUCTION NO. 22:**

15 All DOCUMENTS RELATING to any loans or advances YOU have received against a  
16 life insurance policy during the past ten (10) years.

17 **REQUEST FOR PRODUCTION NO. 23:**

18 All DOCUMENTS EVIDENCING any PERSON that owes YOU money, including the  
19 amount owed, basis for the debt, and repayment terms.

20 **REQUEST FOR PRODUCTION NO. 24:**

21 All DOCUMENTS EVIDENCING any interest YOU have or have had in the estate of a  
22 deceased person, including wills, trust documents, probate filings, or communications regarding  
23 any such interest.

24 **REQUEST FOR PRODUCTION NO. 25:**

25 All DOCUMENTS RELATED to any residential property in which YOU have resided  
26 during the past ten (10) years.

27 **REQUEST FOR PRODUCTION NO. 26:**

28 All DOCUMENTS RELATED to any ownership or possessory interest YOU have or have

1 had in any real property in the United States of America during the last ten (10) years.

2 **REQUEST FOR PRODUCTION NO. 27:**

3 All DOCUMENTS RELATED to any ownership or possessory interest YOU have or have  
4 had in any real property outside of the United States of America during the last ten (10) years.

5 **REQUEST FOR PRODUCTION NO. 28:**

6 All DOCUMENTS EVIDENCING all income, salaries, bonuses, disbursements, and/or  
7 other compensation YOU received from YOUR BUSINESSES during the past ten (10) years.

8 **REQUEST FOR PRODUCTION NO. 29:**

9 All DOCUMENTS EVIDENCING any accountants, financial advisors, certified public  
10 accountants, and/or tax advisors with whom YOU consulted during the past ten (10) years.

11 **REQUEST FOR PRODUCTION NO. 30:**

12 All DOCUMENTS RELATED TO any disability pensions on any insurance policy that  
13 YOU have received during the past ten (10) years.

14 **REQUEST FOR PRODUCTION NO. 31:**

15 All DOCUMENTS EVIDENCING the present value, description and location of all real  
16 and personal assets transferred by YOU to YOUR children during the last ten (10) years, and the  
17 consideration paid for each such transfer.

18 **REQUEST FOR PRODUCTION NO. 32:**

19 All DOCUMENTS EVIDENCING any money YOU transferred to YOUR children during  
20 the past ten (10) years.

21 **REQUEST FOR PRODUCTION NO. 33:**

22 All DOCUMENTS EVIDENCING to any real property in which YOU have or have had  
23 an interest (whether equity, security, monetary, debt, or other legal interest) in the Unites States of  
24 America during the past ten (10) years.

25 **REQUEST FOR PRODUCTION NO. 34:**

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


1 **REQUEST FOR PRODUCTION NO. 35:**

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

4  
5 DATED: July 17, 2025

DORDICK LAW CORPORATION

6  
7  
8 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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25 \_\_\_\_\_  
26 GUSTAVO GONZALEZ-RAMOS  
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**SERVICE LIST**

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

**Case No: 20STCV37498**

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