

Google Inc.  
1600 Amphitheatre Parkway  
Mountain View, California 94043



google-legal-support@google.com  
www.google.com

February 3, 2022

***Via Email Only***

*adam@fernaldlawgroup.com*

Adam Zaffos  
Fernald Law Group APC  
15910 Ventura Boulevard, Suite 1702  
Encino, California 91436  
323-410-0327

**Re: *Dr. Iman Sadeghi v. Pinscreen, et al.*, Superior Court of California, County of Los Angeles, BC709376 (Internal Ref. No. 6643027)**

Dear Adam Zaffos:

Pursuant to the subpoena issued in the above-referenced matter, we have conducted a diligent search for documents and information stored in the Google Workspace account associated with *iman@pinscreen.com* that are responsive to your request. Without waiving, and subject to its objections, Google hereby offers this Certificate of Absence of Business Records. Our response is made in accordance with state and federal law, including the Electronic Communications Privacy Act. See 18 U.S.C. § 2701 et seq.

Very truly yours,

Jordan Zuccarello  
Legal Investigations Support



## CERTIFICATE OF ABSENCE OF BUSINESS RECORDS

I hereby certify:

1. I am a Custodian of Records employed by Google LLC. ("Google"), located in Mountain View, California. I am authorized to submit this affidavit pursuant to Cal. Evid. § 1561 on behalf of Google. I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.
2. Google provides Internet-based services, including Gmail, to its subscribers.
3. Google makes and retains records associated with current and historical Google Workspace accounts. Google servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted by the user. This data is kept in the course of this regularly conducted activity and is made by regularly conducted activity as a regular practice of Google
4. In response to a subpoena dated September 13, 2021 (Google LLC Internal Reference No. 6643027) in the matter of Dr. Iman Sadeghi v. Pinscreen, et al., No. BC709376 (Cal. Sup. Ct.), I have made or caused to be made a diligent search of those records for a Google Workspace account associated with iman@pinscreen.com. The Google Account identified by the subpoena as iman@pinscreen.com was deleted on August 7, 2017 and subsequently purged from Google systems. Accordingly, Google's diligent search did not identify records responsive to this request.

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

Executed: February 3, 2022

A handwritten signature in cursive script that reads "Jordan Zuccarello".

Signature of Custodian of Records

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Adam Zaffos, Esq. (SBN: 217669)</b> <b>Fernald Law Group APC</b> <b>15910 Ventura Blvd. Suite 1702, Encino, California 91436</b> TELEPHONE NO.: <b>323-410-0327</b> FAX NO.: <b>323-410-0330</b> E-MAIL ADDRESS: <b>adam@fernaldlawgroup.com</b> ATTORNEY FOR (Name): <b>Plaintiff, Dr. Iman Sadeghi</b>	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: <b>111 North Hill Street</b> MAILING ADDRESS: <b>111 North Hill Street</b> CITY AND ZIP CODE: <b>Los Angeles 90012</b> BRANCH NAME: <b>Stanley Mosk Courthouse</b>	
PLAINTIFF/PETITIONER: <b>Dr. Iman Sadeghi</b> DEFENDANT/RESPONDENT: <b>Pinscreen, et al.</b>	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	CASE NUMBER: <b>BC709376</b>

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**  
**Google, LLC c/o CSC; 2710 Gateway Oaks Drive, Ste. 150N, Sacramento, CA 95833**

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:**

To (name of deposition officer): <b>J.J. Photocopy Service</b> On (date): <b>October 8, 2021</b> At (time): <b>10:00 a.m.</b> Location (address): <b>1545 Wilshire Blvd #300, Los Angeles, CA 90017</b>
<b>Do not release the requested records to the deposition officer prior to the date and time stated above.</b>

- a.  by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b.  by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c.  by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):  
**See Attachment**

Continued on Attachment 3.

- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: September 13, 2021

Adam P. Zaffos, Esq.  
 (TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law

(Proof of service on reverse)

(TITLE)

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PLAINTIFF/PETITIONER: Dr. Iman Sadeghi	CASE NUMBER:
DEFENDANT/RESPONDENT: Pinscreen, et al.	BC709376

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

Courtesy Copy: google-legal-support@google.com

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.

Amount: ..... \$ \_\_\_\_\_

(2)  Copying fees were paid.

Amount: ..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

a.  Not a registered California process server.

b.  California sheriff or marshal.

c.  Registered California process server.

d.  Employee or independent contractor of a registered California process server.

e.  Exempt from registration under Business and Professions Code section 22350(b).

f.  Registered professional copier.

g.  Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

**I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

▶ \_\_\_\_\_

(SIGNATURE)

**(For California sheriff or marshal use only)**

**I certify** that the foregoing is true and correct.

Date:

▶ \_\_\_\_\_

(SIGNATURE)

SHORT TITLE: Dr. Iman Sadeghi v. Pinscreen, Inc., et al.	CASE NUMBER: BC709376
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**ATTACHMENT** (Number): 3

*(This Attachment may be used with any Judicial Council form.)*

### DEFINITIONS AND INSTRUCTIONS

1. The terms "DOCUMENT" or "DOCUMENTS" shall have the broadest meaning accorded to it by section 2016.020(c) of the California Code of Civil Procedure and includes, but is not limited to, all of the matters defined in section 250 of the California Evidence Code, including by way of illustration only and not by way of limitation, the following: e-mails, channels, group messages, direct messages, documents, spreadsheets, slides, forms, version history, versions, revisions, comments, notes, computer files, text files, binary files, images, videos, audio, metadata, and electronically stored information.
2. The terms "RELATE TO" and "RELATED TO" shall mean commenting on, evidencing, supporting, regarding, discussing, describing, identifying, mentioning, reflecting, referring to, concerning, containing, contradicting, constituting, indicating, embodying, studying, analyzing, evaluating, or otherwise pertaining to.
3. The term "PERSON," in the plural as well as the singular, shall mean any individual, firm, proprietorship, association, partnership, corporation, joint venture or any other legal entity.
4. If any DOCUMENT responsive to the requests set forth below exist in an electronic, digital, magnetic, or computer format, such DOCUMENTS are to be produced in their native format (except that encrypted documents shall be produced in unencrypted form), along with a description of all programs that were used to create the DOCUMENT and that can be used to view the DOCUMENT.
5. If a DOCUMENT called for in this request is withheld under a claim of privilege, furnish a list reflecting each DOCUMENT for which the privilege is claimed and, with respect to each such DOCUMENT, provide the following information:
  - (a) the name, address and title of each addressee;
  - (b) the name, address and title of each addressor;
  - (c) each PERSON to whom copies were sent or distributed and any other PERSON to whom such DOCUMENT or its contents were disclosed;

*(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)*

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*(Add pages as required)*

SHORT TITLE: Dr. Iman Sadeghi v. Pinscreen, Inc., et al.	CASE NUMBER: BC709376
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ATTACHMENT (Number): 3

(This Attachment may be used with any Judicial Council form.)

DOCUMENTS TO BE PRODUCED

- 1) All DOCUMENTS created by iman@pinscreen.com from February 2, 2017 to August 7, 2017.
- 2) All DOCUMENTS modified by iman@pinscreen.com from February 2, 2017 to August 7, 2017. on <http://docs.google.com/a/pinscreen.com/>.
- 3) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1Efej\\_qLs\\_4M3ieA0qotLkQqy40gEF\\_R-\\_V8pROLIZUY/edit](https://docs.google.com/a/pinscreen.com/document/d/1Efej_qLs_4M3ieA0qotLkQqy40gEF_R-_V8pROLIZUY/edit) from February 2, 2017 to August 7, 2017.
- 4) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/document/d/1ozO4Nb-H5b4wy0glQm9k2Q8b60yhgorpC1PdanOjDtQ/edit> from February 2, 2017 to August 7, 2017.
- 5) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/document/d/1bCNqLQDSuFPxqTReKBR5tIwvXgjsj84FpUgvmZEf0C9A/edit> from February 2, 2017 to August 7, 2017.
- 6) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/document/d/1w7ow9PW4HTBE5UilkoROQ4h6CchxQbpoWNXjZZ2WH5c/edit> from February 2, 2017 to August 7, 2017.
- 7) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1w7TLtCK7ftUk1dQIN20e-d48Oxem0O9PsJ1\\_k-SqzsQ/edit](https://docs.google.com/a/pinscreen.com/document/d/1w7TLtCK7ftUk1dQIN20e-d48Oxem0O9PsJ1_k-SqzsQ/edit) from February 2, 2017 to August 7, 2017.
- 8) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1W2BudSk5fB11YzCQz0OzL\\_A080n1vZPGoNCSxf6ICcQ/edit](https://docs.google.com/a/pinscreen.com/document/d/1W2BudSk5fB11YzCQz0OzL_A080n1vZPGoNCSxf6ICcQ/edit) from February 2, 2017 to August 7, 2017.
- 9) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/document/d/1NzwUpKXjYyhGsCHokcRCMTgK3OC5ftFgBHIA5IjcgU/edit> from February 2, 2017 to August 7, 2017.
- 10) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/document/d/1iUPehGf9oTnWUV7SRuFnP9QWU-KEopOvMK-ivdaUqQE/edit> from February 2, 2017 to August 7, 2017.
- 11) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1I\\_971F8a43\\_Mn5No\\_bdG4SXYJGFm7YIcRjs0V7BkTOK/edit](https://docs.google.com/a/pinscreen.com/document/d/1I_971F8a43_Mn5No_bdG4SXYJGFm7YIcRjs0V7BkTOK/edit) from February 2, 2017 to August 7, 2017.
- 12) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1TbVH6yhIjqvOTz-B\\_-qqCSQ7AFHVzl\\_inbbIB7Bdfb0/edit](https://docs.google.com/a/pinscreen.com/document/d/1TbVH6yhIjqvOTz-B_-qqCSQ7AFHVzl_inbbIB7Bdfb0/edit) from February 2, 2017 to August 7, 2017.
- 13) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to [https://docs.google.com/a/pinscreen.com/document/d/1VOY9eDxirYK5NKd8RUAiLuW\\_\\_mFKpZQKBhfbveqLnAw/edit](https://docs.google.com/a/pinscreen.com/document/d/1VOY9eDxirYK5NKd8RUAiLuW__mFKpZQKBhfbveqLnAw/edit) from February 2, 2017 to August 7, 2017.
- 14) All DOCUMENTS that RELATE TO modifications made by iman@pinscreen.com to <https://docs.google.com/a/pinscreen.com/spreadsheets/d/18DsnyQxP3MymxM0x1D6I59rBVwff2rv2SrQvDKq5KcU/edit> from February 2, 2017 to August 7, 2017.
- 15) All DOCUMENTS created by iman@pinscreen.com from February 2, 2017 to August 7, 2017 that were deleted or modified after August 7, 2017.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

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(Add pages as required)