



MEMO

To: [REDACTED]
From: Christina Davidesko
Date: October 31, 2022
Re: Discovery Summary – Plaintiff’s Responses to Defendant’s Discovery

Executive Summary

This memorandum summarizes [REDACTED]’s (Plaintiff) responses to the following discovery requests: **Plaintiff’s Responses to General Interrogatories (1-36) – 10 pages**

Please note that identical responses have been grouped together. This memorandum is 6 pages.

Plaintiff’s Response Highlights

- Since [REDACTED], Plaintiff has been renting an apartment: [REDACTED] for \$ [REDACTED] per month.
- Currently employed with [REDACTED] full-time (since [REDACTED]) as a [REDACTED] earning a gross income of \$ [REDACTED] (bi weekly) and a net income of \$ [REDACTED] (bi weekly).
- Plaintiff is also working with [REDACTED]. Income is reflected on his tax returns. Started [REDACTED] this position will be until [REDACTED].
- Plaintiff owns [REDACTED] 100% and has investments in Cryptocurrency valuing approximately \$ [REDACTED].
- Plaintiff has 401k plan with his employer [REDACTED] and his prior employer [REDACTED]. As of [REDACTED], [REDACTED]’s 401k valued at \$ [REDACTED]. Plaintiff still needs to provide the [REDACTED]’s 401k value.



Plaintiff's Responses to Defendant's General Interrogatories (1-36)

Plaintiff's response to General Interrogatories No. 1 —

Plaintiff states his full name, address at [REDACTED]

Plaintiff's response to General Interrogatories No. 2 —

Plaintiff states he has earned a Masters Degree in Computer Science, receiving a MBA-MIS in [REDACTED] from [REDACTED] and BBA in [REDACTED] from [REDACTED]. He also states he has earned a [REDACTED].

Plaintiff's response to General Interrogatory **No. 3 (first set)** —

Plaintiff states the General Interrogatories had two questions labeled as number 3.

Plaintiff states his last four (4) places of employment with business's addresses. Reference to see W-2 statements and 401(k) and employee stock provided in Notice to Produce.

[REDACTED] with full time employment from [REDACTED] to Present. Gross income of \$ [REDACTED] and net income of \$ [REDACTED] paid bi-weekly.

[REDACTED] as a [REDACTED] with full time employment from [REDACTED] to [REDACTED] due to a better opportunity at [REDACTED].

[REDACTED] as a [REDACTED] with a [REDACTED] month contract from [REDACTED] to [REDACTED].

[REDACTED] as a [REDACTED] with a [REDACTED] year contract from [REDACTED] to [REDACTED].

Plaintiff's response to General Interrogatories **No. 3 (second set)** —

Plaintiff states employment at [REDACTED] with business's address from [REDACTED] to Present with position being remote for one (1) year, ending by [REDACTED]. Reference to see tax returns for remaining subset questions.

Plaintiff's response to General Interrogatories No. 4 —

Plaintiff has been renting an apartment since [REDACTED] paying \$ [REDACTED] per month, plus electricity, gas and other utility charges.