

essages are published with permission of the sender. The general topic of this message is Homeland Security:

Subject:  
~~Reza Zandian, a known terrorist and criminal,~~

To:  
~~President George Bush~~

~~October 14, 2005~~

~~October 14, 2005~~

To Whom It May Concern:

~~Regarding: Reza Zandian, a.k.a Golamreza Zandianjazi,  
et al.  
Sir/Madam,~~

~~I would like to know why the U.S. Government continues to allow Reza Zandian, a known terrorist and criminal, to continue his operations in the United States (see attached Homeland Security email from Mark Cutchen).~~

~~In 1993, Zandian and his partner, Charles Reeger, were first arrested for attempting to export a main frame computer to Iran with the intent to complete their missile system in order to destroy Israel.~~

~~Zandian and Reeger were arrested during the export attempt, as IBM was working with U.S. Customs, and both were jailed. My attorneys tell me that the charges were then dismissed by a judge due to the government's failure to follow procedure and document proper evidence.~~

~~In 1995, U.S. Customs got smart and banned Zandian from the United States, from owning a U.S. company, and exporting from the U.S. for ten years.~~

~~It was around that time that Zandian set up a fake Swiss company, Emfaco, to hide his ownership of his key company, Optima Technology Corporation; a company based in the U.S. While hiding his ownership of Optima, he laundered money through the company from 1995-1999 for terrorists in Iran.~~

~~Zandian kept his ownership of Optima hidden until 2002 when he sold the company to Robert Adams, myself (who worked as CEO of Optima from 2001-2002) and investors.~~

~~I state that Zandian lied to me and used me to get a U.S. Visa. He said he would sell me a bankrupt company, Optima Technology Corp.; he knew I felt it had great~~

◆Brand,◆ and in exchange, I was to get him a working Visa. Zandian told me he would have his attorney do all the paperwork. He stated that by doing it this way, I would not be lying on the papers as he owned Emfaco and thus owned Optima Technology Corporation still hiding his ownership from U.S. Customs. Zandian was the one lying and not I as he would take the heat if anything came up he said. I warned him that he better not be

◆screwing me over◆ as I have a long Navy & Reserve career, am in good standing, and would never do anything to jeopardize that.

During the time I worked for Zandian, 2001-2002, he made countless attempts to have me import and export main frame computers and unknown products to France, China and Iran. I say ◆unknown◆ because Zandian refused to provide export manifests unless I first agreed to the amount of money he was to pay to me. I refused all attempts by him to export these unknown containers to Asia, France and Iran.

It was also during this time that I found out how much hatred Zandian had for the United States due to his prosecution by the U.S. government in 1995. Several times, during social occasions, he claimed to be part of a terrorist group aiding his home country, Iran. He even showed me a copy of one of his 12-15 passports. (See attached copy of said Iranian passport.)

After discovering the true ownership of Optima from 1995 - 2002 and details noted previously regarding Zandian, I reported the information to the local and federal authorities; all to no avail.

In 2002, I found out from Homeland Security that Zandian had set up a fake California company, Optima Technics, using my Social Security number and personal information. An investigation by Homeland Security and myself, found out that Zandian did this in order to obtain a Federal Tax ID number (TIN).

Zandain used that TIN number to import containers into Long Beach, CA that he purported to contain millions of dollars worth of printing equipment, under then name of ◆Optima,◆ not Optima Technics (see attached documents from shipper).

Zandain then shipped only two of the twenty or so containers to a fake address in Las Vegas, Nevada, however, at the last minute, he had them both diverted to a different address. Both of the containers contained some type of radioactive material. Zandain then hid them at his friend◆s shopping center, under a real company name, and without the permission of the owner (see

attached docs).

The remaining containers were left at the port storage yard in Long Beach. Homeland Security checked them and proved they contained only worthless obsolete equipment.

I now understand that the two empty containers were found in Las Vegas and showed signs of radioactivity. Zandain has not surfaced and is in hiding from the government before he enacts his of sadistic revenge on Las Vegas and the US Government.

What I want to know is why our government has not taken action to rid the U.S. of this terrorist before he kills everyone in Las Vegas.

I can be reached for comment at my direct number 949-981-9208 and/or through my attorneys Mark Adams of SAMUELS, GREEN, STEEL & ADAMS, LLP (949) 263-0004

Sincerely

Robert Adams ♦ Owner of Optima Technology Corp.  
an loyal Concerned US Citizen

Irvine , CA

#### Related Issue Alerts:

- ♦ SAY NO to S. 1873! Fight the Latest Assault on the Civil Rights of Vaccine Injured Children! - Advocates for Children's Health Affected by Mercury Poisoning
- ♦ ACTION ALERT: USA PATRIOT ACT REAUTHORIZATION - League of Women Voters
- ♦ \$200 Million Can Save a Lot of Lives - RESULTS
- ♦ Send message to congressional leaders: Make anti-torture language the law! - Unitarian Universalist Service Committee

[more action alerts...](#)

08/14/2004 11:35 FAX  
03/14/2004 1:31 BC

DESTINY RECORDS  
IN WORK DEVELOPMENT

001  
PAGE 01  
Page 1 of 1

Main Identity

From: "Kerrie Supanich" <supanich@westwendovercity.com>  
To: <comelville@westwendovercity.com>  
Sent: Tuesday, September 07, 2004 10:21 AM  
Attach: Reza-PR-final.pdf  
Subject: Fw: Recent press release that may effect your area

[REDACTED]  
REZA ZANDIAN  
DATE OF BIRTH

ADAM STE...

----- Original Message -----

From: Robert Adams  
To: kerrie@westwendovercity.com  
Cc: ksupanich@westwendovercity.com  
Sent: Thursday, September 02, 2004 5:51 PM  
Subject: Recent press release that may effect your area

Sir/Madam,

Should you come into contact with a Mr. Reza Zandian, please notify your local police department and have them contact, Special Agent William McLane 819-744-4600-Homeland Security, or Special Agent Richard Weir 949-251-8722 and Earl Astrada 949-251-9001 Special Agent with U.S. Department of Commerce, Bureau of Export Enforcement.

We are bringing this information to your city as we read a recent item that a Reza Zandian was operating in your area and that a reward is offered for this person's arrest.

<http://www.ohw.com/intro.html>

<http://www.elkocounty.com/articles/2004/03/04/news/local/news1.txt>

Thank you

Robert Adams  
CEO, Optima Technology  
[www.optimatech.com](http://www.optimatech.com)  
949-881-8108 Direct  
949-478-0515 ext. 114  
949-478-0813 Fax

Simply Smarter Storage & Encryption Software Solutions Since 1990!

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D. H.  
[REDACTED]

(649) 744-4880  
Tim Tim

Mr. Adams:  
for your information, MR. Reza Zandian  
is presently residing at the address  
below:  
Tower 8775  
Lajolla Village Dr.  
Costa Verde Blvd. 92037  
(Right across from  
Marriott Hotel  
at 4240 Lajolla Village Dr.)

Lives:  
on the  
1st  
floor

05853

TO: RAH  
O REZA  
FM: CHRIS MEHILLE

**Main Identity**

**From:** "Kerrie Supanich" <supanich@westwendovercity.com>  
**To:** <cmelville@westwendovercity.com>  
**Sent:** Tuesday, September 07, 2004 10:21 AM  
**Attach:** Reza-PR-final.pdf  
**Subject:** Fw: Recent press release that may effect your area

----- Original Message -----

**From:** Robert Adams  
**To:** [lbrown@westwendovercity.com](mailto:lbrown@westwendovercity.com)  
**Cc:** [ksupanich@westwendovercity.com](mailto:ksupanich@westwendovercity.com)  
**Sent:** Thursday, September 02, 2004 5:51 PM  
**Subject:** Recent press release that may effect your area

Sir/Madam,

Should you come into contact with a Mr. Reza Zandian, please notify your local police department and have them contact, Special Agent William McLane 619-744-4600-Homeland Security, or Special Agent Richard Weir 949-251-8722 and Earl Astrada 949-251-9001-Special Agent with U.S. Department of Commerce, Bureau of Export Enforcement.

We are bringing this information to your city as we read a recent item that a Reza Zandian was operating in your area and that a reward is offered for this person's arrest.

<http://www.niwr.com/intro.html>

<http://www.elkodaily.com/articles/2004/03/04/news/local/news1.txt>

Thank you

Robert Adams  
CEO, Optima Technology  
[www.optimatech.com](http://www.optimatech.com)  
949-981-9208 Direct  
949-476-0515 ext. 114  
949-476-0613 Fax

Simply Smarter Storage & Encryption Software Solutions Since 1990!

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9/14/04

02654



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koroghli@msn.com

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From : Robert Adams &lt;radams@optimatech.com&gt;

| | | | Inbox

Sent : Tuesday, September 6, 2005 4:55 PM

To : &lt;Koroghli@msn.com&gt;

CC : "Matt Bahrami" &lt;mbahrami25@hotmail.com&gt;

Subject : Thanks you for your time and the meeting Friday Ray, it was good to meet you

Attachment: IndexofRezaZandianDocuments.doc (0.03 MB), Doc04002.pdf (0.48 MB), ADoc.pdf (0.03 MB), passport.TIF (0.02 MB), Reza-02-Agee.pdf (0.05 MB), Reza\_OptimaVisa.pdf (0.05 MB), 996-11-20040113082709.pdf (0.16 MB)

Ray,

It was good meeting with you last Friday, by partner Matt and I now begin to understand the complete devastation and destruction that Zandain has caused.

I met with Mark Cutchen today at my attorneys office, once comment he made was that he agrees we should team up against Zandain through the use of my attorneys since they can file for all of you and the others in Las Vegas against Zandain.

The other idea that you came up with to get Zandain to Reno, Mark will look into that and get back to me this week.

In the mean time I will forward you some docs you may be interested in.

The 966-11 document is the fake company that Zandian setup under my name without me knowing anything about it and then used it to get a FED TAX id number to import the containers under a fake Optima as you can see even though its Optima Technics dba Image line graphics.

Fred and yours interest in the case will nail Zandain so that he is stopped and is jailed forever Mark says.

As I told you Optima has enough on our hands with the patent lawsuit that we are winning an money is very very tight, all our money goes into that lawsuit. That's why we drove out verse taking a plane to see you last Friday.

I am even considering right now to refi my home to its max just to get the last 100-150K to get us to the Feb - 06 trail if need be.

Once we win this lawsuit. I told Matt that we need to have you help guide us in investing our money (80-150 Million) in land deals as both Matt and I have never invested into those types of deals.

Thank you

Robert Adams  
CEO, Optima Technology  
www.optimatech.com  
949-981-9208 Direct  
949-476-0515 ext. 112  
949-476-0613 Fax

Simply Smarter Storage & Encryption Software Solutions Since 1990!

1 SAMUELS, GREEN, STEEL & ADAMS, LLP  
2 MARK S. ADAMS, State Bar No. 125485  
3 SCOTT R. ALBRECHT, State Bar No. 201614  
4 RYAN N. BURNS, State Bar No. 215939  
5 1980 MacArthur Blvd., Suite 1000  
6 Irvine, California 92612  
7 Telephone: (949) 263-0004  
8 Facsimile: (949) 263-0005

9 Attorneys for Defendant  
10 ROBERT ADAMS

11 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
12 COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

13 EMFACO S.A., a corporation,

14 Plaintiff,

15 v.

16 ROBERT ADAMS, BARRY EISLER, JACK  
17 GEERING, PAUL JONES, and Does 1  
18 through 100, inclusive;

19 Defendants.

CASE NO. 04CC11008

Assigned for all purposes to:  
Judge Peter J. Polos  
Department C33

**DEFENDANT ROBERT ADAMS' SPECIAL  
INTERROGATORIES PROPOUNDED TO  
PLAINTIFF EMFACO, S.A.;  
DECLARATION FOR ADDITIONAL  
DISCOVERY [CCP §2030(C)(1)]**

[SET NO. ONE]

Complaint filed November 4, 2004

20 PROPOUNDING PARTY: Defendant ROBERT ADAMS

21 RESPONDING PARTY: Plaintiff EMFACO, S.A.

22 SET NUMBER: One

1 TO RESPONDING PARTY AND RESPONDING PARTY'S ATTORNEYS OF  
2 RECORD:

3 Pursuant to California Code of Civil Procedure §2030, Defendant ROBERT ADAMS  
4 ("ADAMS") hereby requests that Plaintiff EMFACO, S.A. ("Responding Party") respond in  
5 writing under oath within thirty (30) days from the date of service hereof to each of the following  
6 special interrogatories.

7 DEFINITIONS

8 As used herein the following terms which appear in capital letters have the following  
9 meanings:

10 1. The terms "DOCUMENT" and "DOCUMENTS" mean and include ANY printed,  
11 typewritten, handwritten, graphic or recorded matter of whatever character including but not  
12 limited to letters, memoranda, telegrams, handwritten notes, books, periodicals, pamphlets,  
13 reports, records, studies, papers, ledgers, account books, written statements of witnesses or  
14 persons having knowledge of relevant facts, summaries of meetings or oral  
15 COMMUNICATIONS, minutes, written agendas, catalogs and brochures, checks, check stubs,  
16 invoices, bills, statements, receipts, work orders, claims, diaries, calendars, appointment books,  
17 journals, magnetic disks, magnetic tapes, computer printouts, punch cards, E-Mail or ANY other  
18 form of the computer readable material or retrievable data stored in ANY computer or computer  
19 system including carbon or photographic or other types of copies of such material. The term  
20 "DOCUMENT" includes the definition of "WRITING" as defined in Evidence Code Section 250.

21 2. The term "ALL DOCUMENTS" means every DOCUMENT as above defined  
22 known to YOU and within YOUR possession, custody, or control.

23 3. The term "ANY" and "ALL" shall be broadly construed to yield ALL information  
24 which may pertain to the request.

25 4. The terms "YOU," "YOUR," and "EMFACO" and shall refer to Plaintiff herein,  
26 EMFACO S.A., and anyone acting on its behalf, including agents, representatives, employees,  
27 insurance companies, its agents, representatives, its employees, attorneys, accountants, and  
28 investigators.





1 **SPECIAL INTERROGATORY NO. 5:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 2, lines 24-25  
3 of YOUR complaint that "EMFACO has appointed REZA ZANDIAN (hereinafter 'ZANDIAN')  
4 to serve as OPTIMA'S sole director, and the President/Treasurer of Optima."  
5

6 **SPECIAL INTERROGATORY NO. 6:**

7 Identify ALL persons RELATING TO YOUR contention at page 2, lines 24-25 of YOUR  
8 complaint that "EMFACO has appointed REZA ZANDIAN (hereinafter 'ZANDIAN') to serve as  
9 OPTIMA'S sole director, and the President/Treasurer of Optima."  
10

11 **SPECIAL INTERROGATORY NO. 7:**

12 State ALL facts RELATING TO YOUR contention at page 2, line 26 of YOUR complaint  
13 that "ADAMS, a former employee, left OPTIMA in 1994."  
14

15 **SPECIAL INTERROGATORY NO. 8:**

16 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 2, line 26 of  
17 YOUR complaint that "ADAMS, a former employee, left OPTIMA in 1994."  
18

19 **SPECIAL INTERROGATORY NO. 9:**

20 Identify ALL persons RELATING TO YOUR contention at page 2, line 26 of YOUR  
21 complaint that "ADAMS, a former employee, left OPTIMA in 1994."  
22

23 **SPECIAL INTERROGATORY NO. 10:**

24 State ALL facts RELATING TO YOUR contention at page 2, lines 26-27 of YOUR  
25 complaint that "[ADAMS] assisted the company as an investigator in 2001 in its litigation against  
26 a previous employee."  
27  
28

1 **SPECIAL INTERROGATORY NO. 11:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 2, lines 26-27 of  
3 YOUR complaint that “[ADAMS] assisted the company as an investigator in 2001 in its litigation  
4 against a previous employee.”  
5

6 **SPECIAL INTERROGATORY NO. 12:**

7 Identify ALL persons RELATING TO YOUR contention at page 2, lines 26-27 of YOUR  
8 complaint that “[ADAMS] assisted the company as an investigator in 2001 in its litigation against  
9 a previous employee.”  
10

11 **SPECIAL INTERROGATORY NO. 13:**

12 State ALL facts RELATING TO YOUR contention at page 3, lines 1-3 of YOUR  
13 complaint that “ADAMS has wrongfully given himself and publicly used for his own gain,  
14 corporate titles without property board approval to either hire him or give him the various titles he  
15 claimed.”  
16

17 **SPECIAL INTERROGATORY NO. 14:**

18 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 1-3 of  
19 YOUR complaint that “ADAMS has wrongfully given himself and publicly used for his own  
20 gain, corporate titles without property board approval to either hire him or give him the various  
21 titles he claimed.”  
22

23 **SPECIAL INTERROGATORY NO. 15:**

24 Identify ALL persons RELATING TO YOUR contention at page 3, lines 1-3 of YOUR  
25 complaint that “ADAMS has wrongfully given himself and publicly used for his own gain,  
26 corporate titles without property board approval to either hire him or give him the various titles he  
27 claimed.”  
28

1 **SPECIAL INTERROGATORY NO. 16**

2 State ALL facts RELATING TO YOUR contention at page 3, lines 4-5 of YOUR  
3 complaint that "ADAMS and other defendants have interfered with and harmed OPTIMA'S day-  
4 to-day operations".

5  
6 **SPECIAL INTERROGATORY NO. 17:**

7 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 4-5 of  
8 YOUR complaint that "ADAMS and other defendants have interfered with and harmed  
9 OPTIMA'S day-to-day operations".

10  
11 **SPECIAL INTERROGATORY NO. 18:**

12 Identify ALL persons RELATING TO YOUR contention at page 3, lines 4-5 of YOUR  
13 complaint that "ADAMS and other defendants have interfered with and harmed OPTIMA'S day-  
14 to-day operations".

15  
16 **SPECIAL INTERROGATORY NO. 19:**

17 State ALL facts RELATING TO YOUR contention at page 3, line 5 of YOUR complaint  
18 that "[ADAMS and the other defendants are] falsely holding themselves out as officers".

19  
20 **SPECIAL INTERROGATORY NO. 20:**

21 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, line 5 of  
22 YOUR complaint that "[ADAMS and the other defendants are] falsely holding themselves out as  
23 officers".

24  
25 **SPECIAL INTERROGATORY NO. 21:**

26 Identify ALL persons RELATING TO YOUR contention at page 3, line 5 of YOUR  
27 complaint that "[ADAMS and the other defendants are] falsely holding themselves out as  
28 officers".

1 **SPECIAL INTERROGATORY NO. 22:**

2 State ALL facts RELATING TO YOUR contention at page 3, lines 6-7 of YOUR  
3 complaint that “[ADAMS and the other defendants are] issuing press releases, e-mails, writing  
4 letters, and selling OPTIMA’s products (and pocketing the revenue therefrom)”.

5  
6 **SPECIAL INTERROGATORY NO. 23:**

7 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 6-7 of  
8 YOUR complaint that “[ADAMS and the other defendants are] issuing press releases, e-mails,  
9 writing letters, and selling OPTIMA’s products (and pocketing the revenue therefrom)”.

10  
11 **SPECIAL INTERROGATORY NO. 24:**

12 Identify ALL persons RELATING TO YOUR contention at page 3, lines 6-7 of YOUR  
13 complaint that “[ADAMS and the other defendants are] issuing press releases, e-mails, writing  
14 letters, and selling OPTIMA’s products (and pocketing the revenue therefrom)”.

15  
16 **SPECIAL INTERROGATORY NO. 25:**

17 State ALL facts RELATING TO YOUR contention at page 3, lines 8-10 of YOUR  
18 complaint that “ADAMS has also held himself out as OPTIMA’S CEO to the law firm Holland &  
19 Knight, LLP, and has hired them to pursue a lawsuit against Roxio in U.S. District Court for  
20 infringement of OPTIMA’S intellectual property rights.”

21  
22 **SPECIAL INTERROGATORY NO. 26:**

23 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 8-10 of  
24 YOUR complaint that “ADAMS has also held himself out as OPTIMA’S CEO to the law firm  
25 Holland & Knight, LLP, and has hired them to pursue a lawsuit against Roxio in U.S. District  
26 Court for infringement of OPTIMA’S intellectual property rights.”

1 **SPECIAL INTERROGATORY NO. 27:**

2 Identify ALL persons RELATING TO YOUR contention at page 3, lines 8-10 of YOUR  
3 complaint that "ADAMS has also held himself out as OPTIMA'S CEO to the law firm Holland &  
4 Knight, LLP, and has hired them to pursue a lawsuit against Roxio in U.S. District Court for  
5 infringement of OPTIMA'S intellectual property rights."  
6

7 **SPECIAL INTERROGATORY NO. 28:**

8 State ALL facts RELATING TO YOUR contention at page 3, lines 11-12 of YOUR  
9 complaint that "ADAMS has forged an 'agreement' purporting to sell OPTIMA to him in  
10 exchange for a visa being issued to ZANDIAN."  
11

12 **SPECIAL INTERROGATORY NO. 29:**

13 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 11-12 of  
14 YOUR complaint that "ADAMS has forged an 'agreement' purporting to sell OPTIMA to him in  
15 exchange for a visa being issued to ZANDIAN."  
16

17 **SPECIAL INTERROGATORY NO. 30**

18 Identify ALL persons RELATING TO YOUR contention at page 3, lines 11-12 of YOUR  
19 complaint that "ADAMS has forged an 'agreement' purporting to sell OPTIMA to him in  
20 exchange for a visa being issued to ZANDIAN."  
21

22 **SPECIAL INTERROGATORY NO. 31:**

23 State ALL facts RELATING TO YOUR contention at page 3, lines 12-13 of YOUR  
24 complaint that "[t]his 'agreement' is a complete fraud and forgery, and was never signed by  
25 ZANDIAN or any authorized officer or director of OPTIMA."  
26  
27  
28

1 **SPECIAL INTERROGATORY NO. 32:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 12-13 of  
3 YOUR complaint that “[t]his ‘agreement’ is a complete fraud and forgery, and was never signed  
4 by ZANDIAN or any authorized officer or director of OPTIMA.”  
5

6 **SPECIAL INTERROGATORY NO. 33:**

7 Identify ALL persons RELATING TO YOUR contention at page 3, lines 12-13 of YOUR  
8 complaint that “[t]his ‘agreement’ is a complete fraud and forgery, and was never signed by  
9 ZANDIAN or any authorized officer or director of OPTIMA.”  
10

11 **SPECIAL INTERROGATORY NO. 34:**

12 State ALL facts RELATING TO YOUR contention at page 3, lines 14-15 of YOUR  
13 complaint that “ADAMS and other defendants have had no role in developing any of the software  
14 developed by OPTIMA or sold by OPTIMA”.  
15

16 **SPECIAL INTERROGATORY NO. 35:**

17 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 14-15 of  
18 YOUR complaint that “ADAMS and other defendants have had no role in developing any of the  
19 software developed by OPTIMA or sold by OPTIMA”.  
20

21 **SPECIAL INTERROGATORY NO. 36:**

22 Identify ALL persons RELATING TO YOUR contention at page 3, lines 14-15 of YOUR  
23 complaint that “ADAMS and other defendants have had no role in developing any of the software  
24 developed by OPTIMA or sold by OPTIMA”.  
25  
26  
27  
28

1 **SPECIAL INTERROGATORY NO. 37:**

2 State ALL facts RELATING TO YOUR contention at page 3, lines 15-16 of YOUR  
3 complaint that “[ADAMS and the other defendants] have no right, title or interest in the products  
4 of OPTIMA or the proceeds from their sale.”  
5

6 **SPECIAL INTERROGATORY NO. 38:**

7 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 3, lines 15-16 of  
8 YOUR complaint that “[ADAMS and the other defendants] have no right, title or interest in the  
9 products of OPTIMA or the proceeds from their sale.”  
10

11 **SPECIAL INTERROGATORY NO. 39:**

12 Identify ALL persons RELATING TO YOUR contention at page 3, lines 15-16 of YOUR  
13 complaint that “[ADAMS and the other defendants] have no right, title or interest in the products  
14 of OPTIMA or the proceeds from their sale.”  
15

16 **SPECIAL INTERROGATORY NO. 40:**

17 State ALL facts RELATING TO YOUR contention at page 4, lines 1-2 of YOUR  
18 complaint that “ADAMS and his co-defendants intend to pocket the proceeds from any settlement  
19 or verdict in the litigation, and to deprive OPTIMA any of the money it is due.”  
20

21 **SPECIAL INTERROGATORY NO. 41:**

22 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 1-2 of  
23 YOUR complaint that “ADAMS and his co-defendants intend to pocket the proceeds from any  
24 settlement or verdict in the litigation, and to deprive OPTIMA any of the money it is due.”  
25  
26  
27  
28



1 **SPECIAL INTERROGATORY NO. 42:**

2 Identify ALL persons RELATING TO YOUR contention at page 4, lines 1-2 of YOUR  
3 complaint that "ADAMS and his co-defendants intend to pocket the proceeds from any settlement  
4 or verdict in the litigation, and to deprive OPTIMA any of the money it is due."  
5

6 **SPECIAL INTERROGATORY NO. 43:**

7 State ALL facts RELATING TO YOUR contention at page 4, lines 3-4 of YOUR  
8 complaint that "HOLLAND & KNIGHT, LLP has been put on notice, and has been provided  
9 with evidence of ADAM'S and his co-defendant's wrong doing".  
10

11 **SPECIAL INTERROGATORY NO. 44:**

12 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 3-4 of  
13 YOUR complaint that "HOLLAND & KNIGHT, LLP has been put on notice, and has been  
14 provided with evidence of ADAM'S and his co-defendant's wrong doing".  
15

16 **SPECIAL INTERROGATORY NO. 45:**

17 Identify ALL persons RELATING TO YOUR contention at page 4, lines 3-4 of YOUR  
18 complaint that "HOLLAND & KNIGHT, LLP has been put on notice, and has been provided  
19 with evidence of ADAM'S and his co-defendant's wrong doing".  
20

21 **SPECIAL INTERROGATORY NO. 46:**

22 State ALL facts RELATING TO YOUR contention at page 4, lines 5-6 of YOUR  
23 complaint that "[i]n reality none of the defendants has any relationship to OPTIMA, and no right  
24 to any of the frauds coming from OPTIMA'S lawsuits."  
25  
26  
27  
28

1 **SPECIAL INTERROGATORY NO. 47:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 5-6 of  
3 YOUR complaint that "[i]n reality none of the defendants has any relationship to OPTIMA, and  
4 no right to any of the frauds coming from OPTIMA'S lawsuits."  
5

6 **SPECIAL INTERROGATORY NO. 48:**

7 Identify ALL persons RELATING TO YOUR contention at page 4, lines 5-6 of YOUR  
8 complaint that "[i]n reality none of the defendants has any relationship to OPTIMA, and no right  
9 to any of the frauds coming from OPTIMA'S lawsuits."  
10

11 **SPECIAL INTERROGATORY NO. 49:**

12 State ALL facts RELATING TO YOUR contention at page 4, lines 13-14 of YOUR  
13 complaint that "[d]efendant ADAMS and his co-defendant's charade is for the purpose, among  
14 other things, of obtaining and stealing the proceeds from OPTIMA'S lawsuit against ROXIO."  
15

16 **SPECIAL INTERROGATORY NO. 50:**

17 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 13-14 of  
18 YOUR complaint that "[d]efendant ADAMS and his co-defendant's charade is for the purpose,  
19 among other things, of obtaining and stealing the proceeds from OPTIMA'S lawsuit against  
20 ROXIO."  
21  
22

23 **SPECIAL INTERROGATORY NO. 51:**

24 Identify ALL persons RELATING TO YOUR contention at page 4, lines 13-14 of YOUR  
25 complaint that "[d]efendant ADAMS and his co-defendant's charade is for the purpose, among  
26 other things, of obtaining and stealing the proceeds from OPTIMA'S lawsuit against ROXIO."  
27  
28

1 **SPECIAL INTERROGATORY NO. 52:**

2 State ALL facts RELATING TO YOUR contention at page 4, lines 19-22 of YOUR  
3 complaint that “[d]efendant ADAMS has opened bank accounts under the name of OPTIMA  
4 TECHNOLOGY CORPORATION, in which he is a signatory party, for the express purpose of  
5 depositing and stealing funds meant for OPTIMA, including the proceeds of the Optima v. Roxio  
6 lawsuit.”

7  
8 **SPECIAL INTERROGATORY NO. 53:**

9 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 19-22 of  
10 YOUR complaint that “[d]efendant ADAMS has opened bank accounts under the name of  
11 OPTIMA TECHNOLOGY CORPORATION, in which he is a signatory party, for the express  
12 purpose of depositing and stealing funds meant for OPTIMA, including the proceeds of the  
13 Optima v. Roxio lawsuit.”

14  
15 **SPECIAL INTERROGATORY NO. 54:**

16 Identify ALL persons RELATING TO YOUR contention at page 4, lines 19-22 of YOUR  
17 complaint that “[d]efendant ADAMS has opened bank accounts under the name of OPTIMA  
18 TECHNOLOGY CORPORATION, in which he is a signatory party, for the express purpose of  
19 depositing and stealing funds meant for OPTIMA, including the proceeds of the Optima v. Roxio  
20 lawsuit.”

21  
22 **SPECIAL INTERROGATORY NO. 55:**

23 State ALL facts RELATING TO YOUR contention at page 4, lines 23-24 of YOUR  
24 complaint that “ADAMS has also incorporated another company under the confusingly similar  
25 name, Optima Technology Inc.”

1 **SPECIAL INTERROGATORY NO. 56:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 4, lines 23-24 of  
3 YOUR complaint that "ADAMS has also incorporated another company under the confusingly  
4 similar name, Optima Technology Inc."  
5

6 **SPECIAL INTERROGATORY NO. 57:**

7 Identify ALL persons RELATING TO YOUR contention at page 4, lines 23-24 of YOUR  
8 complaint that "ADAMS has also incorporated another company under the confusingly similar  
9 name, Optima Technology Inc."  
10

11 **SPECIAL INTERROGATORY NO. 58:**

12 State ALL facts RELATING TO YOUR contention at page 5, lines 4-5 of YOUR  
13 complaint that "[a]dditionally ADAMS has opened bank accounts at Privet Bank in Orange  
14 County, and these accounts have received over \$150,000.00 in wire transfers from ZANDIAN  
15 and others."  
16

17 **SPECIAL INTERROGATORY NO. 59:**

18 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 5, lines 4-5 of  
19 YOUR complaint that "[a]dditionally ADAMS has opened bank accounts at Privet Bank in  
20 Orange County, and these accounts have received over \$150,000.00 in wire transfers from  
21 ZANDIAN and others."  
22

23 **SPECIAL INTERROGATORY NO. 60:**

24 Identify ALL persons RELATING TO YOUR contention at page 5, lines 4-5 of YOUR  
25 complaint that "[a]dditionally ADAMS has opened bank accounts at Privet Bank in Orange  
26 County, and these accounts have received over \$150,000.00 in wire transfers from ZANDIAN  
27 and others."  
28

1 **SPECIAL INTERROGATORY NO. 61:**

2 State ALL facts RELATING TO YOUR contention at page 5, lines 6-8 of YOUR  
3 complaint that "ADAMS and his co-defendants have instead stolen, pocketed, and converted this  
4 money to their own use to the deprivation of OPTIMA".

5  
6 **SPECIAL INTERROGATORY NO. 62:**

7 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 5, lines 6-8 of  
8 YOUR complaint that "ADAMS and his co-defendants have instead stolen, pocketed, and  
9 converted this money to their own use to the deprivation of OPTIMA".

10

11 **SPECIAL INTERROGATORY NO. 63:**

12 Identify ALL persons RELATING TO YOUR contention at page 5, lines 6-8 of YOUR  
13 complaint that "ADAMS and his co-defendants have instead stolen, pocketed, and converted this  
14 money to their own use to the deprivation of OPTIMA".

15

16 **SPECIAL INTERROGATORY NO. 64:**

17 State ALL facts RELATING TO YOUR contention at page 5, lines 9-11 of YOUR  
18 complaint that "[d]efendants and each of them have also received funds from other lawsuits  
19 against individuals such as Michael DeCorte, Ray Martin, and others, and have stolen, pocketed,  
20 and converted this money to their own use to the deprivation of OPTIMA".

21

22 **SPECIAL INTERROGATORY NO. 65:**

23 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 5, lines 9-11 of  
24 YOUR complaint that "[d]efendants and each of them have also received funds from other  
25 lawsuits against individuals such as Michael DeCorte, Ray Martin, and others, and have stolen,  
26 pocketed, and converted this money to their own use to the deprivation of OPTIMA".

27

28

1 **SPECIAL INTERROGATORY NO. 66:**

2 Identify ALL persons RELATING TO YOUR contention at page 5, lines 9-11 of YOUR  
3 complaint that “[d]efendants and each of them have also received funds from other lawsuits  
4 against individuals such as Michael DeCorte, Ray Martin, and others, and have stolen, pocketed,  
5 and converted this money to their own use to the deprivation of OPTIMA”.

6  
7 **SPECIAL INTERROGATORY NO. 67:**

8 State ALL facts RELATING TO YOUR contention at page 7, lines 13-14 of YOUR  
9 complaint that “OPTIMA was formed in early 1990.”

10  
11 **SPECIAL INTERROGATORY NO. 68:**

12 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 7, lines 13-14 of  
13 YOUR complaint that “OPTIMA was formed in early 1990.”

14  
15 **SPECIAL INTERROGATORY NO. 69:**

16 Identify ALL persons RELATING TO YOUR contention at page 7, lines 13-14 of YOUR  
17 complaint that “OPTIMA was formed in early 1990.”

18  
19 **SPECIAL INTERROGATORY NO. 70:**

20 State ALL facts RELATING TO YOUR contention at page 7, lines 15-17 of YOUR  
21 complaint that “OPTIMA has numerous useful products that bring in over 6 million dollars per  
22 year for the company such as “CD-R Access”, a program that allows a CD to be rewritable, and  
23 “CD-R Access Pro” an enhanced version of the software.”

24  
25 **SPECIAL INTERROGATORY NO. 71:**

26 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 7, lines 15-17 of  
27 YOUR complaint that “OPTIMA has numerous useful products that bring in over 6 million  
28

1 dollars per year for the company such as "CD-R Access", a program that allows a CD to be  
2 rewritable, and "CD-R Access Pro" an enhanced version of the software."  
3

4 **SPECIAL INTERROGATORY NO. 72:**

5 Identify ALL persons RELATING TO YOUR contention at page 7, lines 15-17 of YOUR  
6 complaint that "OPTIMA has numerous useful products that bring in over 6 million dollars per  
7 year for the company such as "CD-R Access", a program that allows a CD to be rewritable, and  
8 "CD-R Access Pro" an enhanced version of the software."  
9

10 **SPECIAL INTERROGATORY NO. 73:**

11 State ALL facts RELATING TO YOUR contention at page 7, lines 25-26 of YOUR  
12 complaint that "OPTIMA has complied in all respects with the Copyright Act and all other law  
13 governing copyright and has so registered all products under the Copyright and has so registered  
14 all products under the Copyright Act."  
15

16 **SPECIAL INTERROGATORY NO. 74:**

17 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 7, lines 25-26 of  
18 YOUR complaint that "OPTIMA has complied in all respects with the Copyright Act and all  
19 other law governing copyright and has so registered all products under the Copyright and has so  
20 registered all products under the Copyright Act."  
21

22 **SPECIAL INTERROGATORY NO. 75:**

23 Identify ALL persons RELATING TO YOUR contention at page 7, lines 25-26 of YOUR  
24 complaint that "OPTIMA has complied in all respects with the Copyright Act and all other law  
25 governing copyright and has so registered all products under the Copyright and has so registered  
26 all products under the Copyright Act."  
27  
28

1 **SPECIAL INTERROGATORY NO. 76:**

2 State ALL facts RELATING TO YOUR contention at page 8, lines 13-14 of YOUR  
3 complaint that “[t]he goodwill and recognition association with OPTIMA’s distinctive product  
4 names have generated millions of dollars in sales”.

5  
6 **SPECIAL INTERROGATORY NO. 77:**

7 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 8, lines 13-14 of  
8 YOUR complaint that “[t]he goodwill and recognition association with OPTIMA’s distinctive  
9 product names have generated millions of dollars in sales”.

10  
11 **SPECIAL INTERROGATORY NO. 78:**

12 Identify ALL persons RELATING TO YOUR contention at page 8, lines 13-14 of YOUR  
13 complaint that “[t]he goodwill and recognition association with OPTIMA’s distinctive product  
14 names have generated millions of dollars in sales”.

15  
16 **SPECIAL INTERROGATORY NO. 79:**

17 State ALL facts RELATING TO YOUR contention at page 8, lines 21-26 of YOUR  
18 complaint that “beginning in approximately June 2003, ‘ADAMS’, either individually, or in  
19 concert with the other defendants have been actively participating in the...[s]ale of OPTIMA’S  
20 products through its website optimatech.com with diversion of the proceeds into accounts  
21 ADAM’S and/or other Defendants control to the exclusion and deprivation of OPTIMA.”

22  
23 **SPECIAL INTERROGATORY NO. 80:**

24 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 8, lines 21-26 of  
25 YOUR complaint that “beginning in approximately June 2003, ‘ADAMS’, either individually, or  
26 in concert with the other defendants have been actively participating in the...[s]ale of OPTIMA’S  
27 products through its website optimatech.com with diversion of the proceeds into accounts  
28 ADAM’S and/or other Defendants control to the exclusion and deprivation of OPTIMA.”



1 **SPECIAL INTERROGATORY NO. 81:**

2 Identify ALL persons RELATING TO YOUR contention at page 8, lines 21-26 of YOUR  
3 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
4 concert with the other defendants have been actively participating in the...[s]ale of OPTIMA'S  
5 products through its website optimatech.com with diversion of the proceeds into accounts  
6 ADAM'S and/or other Defendants control to the exclusion and deprivation of OPTIMA."  
7

8 **SPECIAL INTERROGATORY NO. 82:**

9 State ALL facts RELATING TO YOUR contention at page 9, lines 1-2 of YOUR  
10 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
11 concert with the other defendants have been actively participating in the [s]ale of 'knock off'  
12 and/or substantially similar software programs using OPTIMA'S source codes."  
13

14 **SPECIAL INTERROGATORY NO. 83:**

15 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 1-2 of  
16 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
17 in concert with the other defendants have been actively participating in the [s]ale of 'knock off'  
18 and/or substantially similar software programs using OPTIMA'S source codes."  
19

20 **SPECIAL INTERROGATORY NO. 84:**

21 Identify ALL persons RELATING TO YOUR contention at page 9, lines 1-2 of YOUR  
22 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
23 concert with the other defendants have been actively participating in the [s]ale of 'knock off'  
24 and/or substantially similar software programs using OPTIMA'S source codes."  
25

26 **SPECIAL INTERROGATORY NO. 85:**

27 State ALL facts RELATING TO YOUR contention at page 9, lines 3-5 of YOUR  
28 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in

1 concert with the other defendants have been actively participating in the [m]arketing, promoting,  
2 and selling OPTIMA'S software programs using OPTIMA's Product Marks, among others,  
3 'DeskTapePro', 'CD-R Access Pro,' and 'DiskArrayPro' without authorization."  
4

5 **SPECIAL INTERROGATORY NO. 86:**

6 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 3-5 of  
7 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
8 in concert with the other defendants have been actively participating in the [m]arketing,  
9 promoting, and selling OPTIMA'S software programs using OPTIMA's Product Marks, among  
10 others, 'DeskTapePro', 'CD-R Access Pro,' and 'DiskArrayPro' without authorization."  
11

12 **SPECIAL INTERROGATORY NO. 87:**

13 Identify ALL persons RELATING RELATING TO YOUR contention at page 9, lines 3-5  
14 of YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually,  
15 or in concert with the other defendants have been actively participating in the [m]arketing,  
16 promoting, and selling OPTIMA'S software programs using OPTIMA's Product Marks, among  
17 others, 'DeskTapePro', 'CD-R Access Pro,' and 'DiskArrayPro' without authorization."  
18

19 **SPECIAL INTERROGATORY NO. 88:**

20 State ALL facts RELATING TO YOUR contention at page 9, lines 6-7 of YOUR  
21 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
22 concert with the other defendants have been actively participating in "[u]sing OPTIMA'S  
23 distinctive Product packaging in connection with his marketing promotion, and sale of  
24 OPTIMA'S products and/or his 'knock-off' software programs."  
25

26 **SPECIAL INTERROGATORY NO. 89:**

27 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 6-7 of  
28 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or

1 in concert with the other defendants have been actively participating in “[u]sing OPTIMA’S  
2 distinctive Product packaging in connection with his marketing promotion, and sale of  
3 OPTIMA’S products and/or his ‘knock-off’ software programs.”  
4

5 **SPECIAL INTERROGATORY NO. 90:**

6 Identify ALL persons RELATING TO YOUR contention at page 9, lines 6-7 of YOUR  
7 complaint that “beginning in approximately June 2003, ‘ADAMS’, either individually, or in  
8 concert with the other defendants have been actively participating in “[u]sing OPTIMA’S  
9 distinctive Product packaging in connection with his marketing promotion, and sale of  
10 OPTIMA’S products and/or his ‘knock-off’ software programs.”  
11

12 **SPECIAL INTERROGATORY NO. 91:**

13 State ALL facts RELATING TO YOUR contention at page 9, lines 8-11 of YOUR  
14 complaint that “beginning in approximately June 2003, ‘ADAMS’, either individually, or in  
15 concert with the other defendants have been actively participating in [m]arketing and selling  
16 ‘knocked-off,’ and/or substantially similar computer software programs using OPTIMA’S source  
17 codes and distinctive Product marks, all in an effort to cause confusion, to deceive customers as  
18 to the source of the products, and to trade off the goodwill developed by OPTIMA.”  
19

20 **SPECIAL INTERROGATORY NO. 92:**

21 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 8-11 of  
22 YOUR complaint that “beginning in approximately June 2003, ‘ADAMS’, either individually, or  
23 in concert with the other defendants have been actively participating in [m]arketing and selling  
24 ‘knocked-off,’ and/or substantially similar computer software programs using OPTIMA’S source  
25 codes and distinctive Product marks, all in an effort to cause confusion, to deceive customers as  
26 to the source of the products, and to trade off the goodwill developed by OPTIMA.”  
27  
28

1 **SPECIAL INTERROGATORY NO. 93:**

2 Identify ALL persons RELATING TO YOUR contention at page 9, lines 8-11 of YOUR  
3 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
4 concert with the other defendants have been actively participating in [m]arketing and selling  
5 'knocked-off,' and/or substantially similar computer software programs using OPTIMA'S source  
6 codes and distinctive Product marks, all in an effort to cause confusion, to deceive customers as  
7 to the source of the products, and to trade off the goodwill developed by OPTIMA."  
8

9 **SPECIAL INTERROGATORY NO. 94:**

10 State ALL facts RELATING TO YOUR contention at page 9, lines 12-14 of YOUR  
11 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
12 concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S  
13 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
14 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
15 of OPTIMA'S website, www.optimatech.com."  
16

17 **SPECIAL INTERROGATORY NO. 95:**

18 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 12-14 of  
19 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
20 in concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S  
21 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
22 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
23 of OPTIMA'S website, www.optimatech.com."  
24

25 **SPECIAL INTERROGATORY NO. 96:**

26 Identify ALL persons RELATING TO YOUR contention at page 9, lines 12-14 of YOUR  
27 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
28 concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S

1 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
2 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
3 of OPTIMA'S website, www.optimizech.com."  
4

5 **SPECIAL INTERROGATORY NO. 97:**

6 State ALL facts RELATING TO YOUR contention at page 9, lines 17-18 of YOUR  
7 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
8 concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S  
9 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
10 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
11 of OPTIMA'S website, www.optimizech.com."  
12

13 **SPECIAL INTERROGATORY NO. 98:**

14 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 17-18 of  
15 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
16 in concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S  
17 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
18 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
19 of OPTIMA'S website, www.optimizech.com."  
20

21 **SPECIAL INTERROGATORY NO. 99:**

22 Identify ALL persons RELATING TO YOUR contention at page 9, lines 17-18 of YOUR  
23 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
24 concert with the other defendants have been actively participating in [c]ontacting OPTIMA'S  
25 internet service provider (ISP), falsely representing that he, ADAMS, was an authorized  
26 representative of OPTIMA and instructing the ISP to hand over the internet website control code  
27 of OPTIMA'S website, www.optimizech.com."  
28

1 **SPECIAL INTERROGATORY NO. 100:**

2 State ALL facts RELATING TO YOUR contention at page 9, lines 19-20 of YOUR  
3 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
4 concert with the other defendants have been actively participating in [c]opying OPTIMA'S logo,  
5 graphics, and content from OPTIMA'S website, without authorization."  
6

7 **SPECIAL INTERROGATORY NO. 101:**

8 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 19-20 of  
9 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
10 in concert with the other defendants have been actively participating in [c]opying OPTIMA'S  
11 logo, graphics, and content from OPTIMA'S website, without authorization."  
12

13 **SPECIAL INTERROGATORY NO. 102:**

14 Identify ALL persons RELATING TO YOUR contention at page 9, lines 19-20 of YOUR  
15 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
16 concert with the other defendants have been actively participating in [c]opying OPTIMA'S logo,  
17 graphics, and content from OPTIMA'S website, without authorization."  
18

19 **SPECIAL INTERROGATORY NO. 103:**

20 State ALL facts RELATING TO YOUR contention at page 9, lines 21-24 of YOUR  
21 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
22 concert with the other defendants have been actively participating in [u]sing the website and the  
23 name of the confusingly similar company, Optima Technology, *Inc.*, a purported Delaware  
24 Corporation, incorporated and controlled by ADAMS and the other Defendants to sell  
25 OPTIMA'S products and knock-offs of OPTIMA'S products, without the permission of  
26 OPTIMA."  
27  
28

1 **SPECIAL INTERROGATORY NO. 104:**

2 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, lines 21-24 of  
3 YOUR complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or  
4 in concert with the other defendants have been actively participating in [u]sing the website and  
5 the name of the confusingly similar company, Optima Technology, *Inc.*, a purported Delaware  
6 Corporation, incorporated and controlled by ADAMS and the other Defendants to sell  
7 OPTIMA'S products and knock-offs of OPTIMA'S products, without the permission of  
8 OPTIMA."

9  
10 **SPECIAL INTERROGATORY NO. 105:**

11 Identify ALL persons RELATING TO YOUR contention at page 9, lines 21-24 of YOUR  
12 complaint that "beginning in approximately June 2003, 'ADAMS', either individually, or in  
13 concert with the other defendants have been actively participating in [u]sing the website and the  
14 name of the confusingly similar company, Optima Technology, *Inc.*, a purported Delaware  
15 Corporation, incorporated and controlled by ADAMS and the other Defendants to sell  
16 OPTIMA'S products and knock-offs of OPTIMA'S products, without the permission of  
17 OPTIMA."

18  
19 **SPECIAL INTERROGATORY NO. 106:**

20 State ALL facts RELATING TO YOUR contention at page 9, line 26 – page 10, line 2 of  
21 YOUR complaint that "beginning some time in mid-2003, 'ADAMS', either individually or in  
22 concert with other defendants, has been using the source codes and other copyrightable protected  
23 property of OPTIMA, without authorization to license and sell OPTIMA software programs to La  
24 Cie S.A., of France."

25  
26 **SPECIAL INTERROGATORY NO. 107:**

27 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 9, line 26 – page  
28 10, line 2 of YOUR complaint that "beginning some time in mid-2003, 'ADAMS', either

1 individually or in concert with other defendants, has been using the source codes and other  
2 copyrightable protected property of OPTIMA, without authorization to license and sell OPTIMA  
3 software programs to La Cie S.A., of France.”  
4

5 **SPECIAL INTERROGATORY NO. 108:**

6 Identify ALL persons RELATING TO YOUR contention at page 9, line 26 – page 10, line  
7 2 of YOUR complaint that “beginning some time in mid-2003, ‘ADAMS’, either individually or  
8 in concert with other defendants, has been using the source codes and other copyrightable  
9 protected property of OPTIMA, without authorization to license and sell OPTIMA software  
10 programs to La Cie S.A., of France.”  
11

12 **SPECIAL INTERROGATORY NO. 109:**

13 State ALL facts RELATING TO YOUR contention at page 10, lines 3-5 of YOUR  
14 complaint that “ADAMS, and the other defendants, on or about June 2003 received and pocketed  
15 \$1,200.00 and 325,000 shares of LaCie stock from the unauthorized sale and licensing of  
16 OPTIMA software to LaCie.”  
17

18 **SPECIAL INTERROGATORY NO. 110:**

19 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 10, lines 3-5 of  
20 YOUR complaint that “ADAMS, and the other defendants, on or about June 2003 received and  
21 pocketed \$1,200.00 and 325,000 shares of LaCie stock from the unauthorized sale and licensing  
22 of OPTIMA software to LaCie.”  
23

24 **SPECIAL INTERROGATORY NO. 111:**

25 Identify ALL persons RELATING TO YOUR contention at page 10, lines 3-5 of YOUR  
26 complaint that “ADAMS, and the other defendants, on or about June 2003 received and pocketed  
27 \$1,200.00 and 325,000 shares of LaCie stock from the unauthorized sale and licensing of  
28 OPTIMA software to LaCie.”



1 **SPECIAL INTERROGATORY NO. 112:**

2 State ALL facts RELATING TO YOUR contention at page 12, lines 19-22 of YOUR  
3 complaint that “[p]laintiff is cognizant of one transaction whereby the Defendants and each of  
4 them illegally sold Optima’s software to LaCie of France for \$1.2 million dollars in cash and  
5 325,000 shares of LaCie, keeping the proceeds of cash and stock for themselves to the exclusion  
6 and deprivation of OPTIMA and Plaintiff, its parent company.”  
7

8 **SPECIAL INTERROGATORY NO. 113:**

9 Identify ALL DOCUMENTS RELATING TO YOUR contention at page 12, lines 19-22  
10 of YOUR complaint that “[p]laintiff is cognizant of one transaction whereby the Defendants and  
11 each of them illegally sold Optima’s software to LaCie of France for \$1.2 million dollars in cash  
12 and 325,000 shares of LaCie, keeping the proceeds of cash and stock for themselves to the  
13 exclusion and deprivation of OPTIMA and Plaintiff, its parent company.”  
14

15 **SPECIAL INTERROGATORY NO. 114:**

16 Identify ALL persons RELATING TO YOUR contention at page 12, lines 19-22 of  
17 YOUR complaint that “[p]laintiff is cognizant of one transaction whereby the Defendants and  
18 each of them illegally sold Optima’s software to LaCie of France for \$1.2 million dollars in cash  
19 and 325,000 shares of LaCie, keeping the proceeds of cash and stock for themselves to the  
20 exclusion and deprivation of OPTIMA and Plaintiff, its parent company.”  
21

22 **SPECIAL INTERROGATORY NO. 115:**

23 State all facts in support of your contention that EMFACO owns OPTIMA.  
24

25 **SPECIAL INTERROGATORY NO. 116:**

26 State all facts in support of your contention that EMFACO is the parent company of  
27 OPTIMA.  
28

1 **SPECIAL INTERROGATORY NO. 117:**

2 State all facts in support of your contention that EMFACO has the authority to prosecute  
3 this litigation on OPTIMA's behalf.

4  
5 **SPECIAL INTERROGATORY NO. 118:**

6 State all facts in support of your contention that you own an interest in EMFACO.

7  
8 **SPECIAL INTERROGATORY NO. 119:**

9 State all facts in support of your contention that you own an interest in OPTIMA.

10  
11 **SPECIAL INTERROGATORY NO. 120:**

12 State all facts in support of your contention that the written agreement dated December 7,  
13 2002, attached hereto as Exhibit "A" is fraudulent.

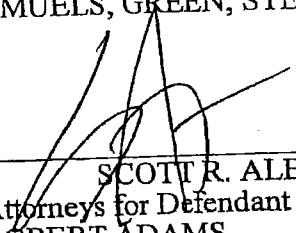
14  
15 **SPECIAL INTERROGATORY NO. 121:**

16 State all facts in support of your contention that the written agreement dated December 7,  
17 2002, attached hereto as Exhibit "A" is unenforceable.

18 DATED: October 13, 2005

SAMUELS, GREEN, STEEL & ADAMS, LLP

19  
20 By \_\_\_\_\_

  
SCOTT R. ALBRECHT  
Attorneys for Defendant  
ROBERT ADAMS

21  
22  
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DECLARATION FOR ADDITIONAL DISCOVERY

I, SCOTT R. ALBRECHT, hereby declare and state as follows:

1. I am an associate with the Law Office of Samuels, Green, Steel & Adams, LLP, attorney for Defendant ROBERT ADAMS ("Defendant") in this action. In my capacity as such, I have personal knowledge regarding the matters of fact set forth below, and if properly called as a witness herein, I could and would competently testify as to these matters.

2. I am propounding to Plaintiff EMFACO, S.A. ("Plaintiff"), the attached first set of Special Interrogatories.

3. This set of special interrogatories will cause the total number of special interrogatories propounded to the party to whom they are directed to exceed the number of special interrogatories permitted by paragraph 1 of subdivision (c) of Section 2030 of the Code of Civil Procedure.

4. I have not previously propounded special interrogatories to this party.

5. This set of special interrogatories contains a total of 121 special interrogatories.

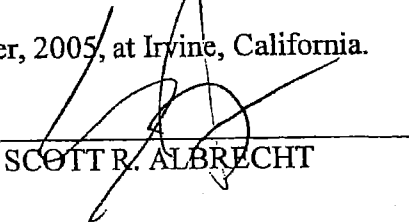
6. I am familiar with the issues and the previous discovery conducted by all of the parties in this case.

7. I have personally examined each of the requests in this set of special interrogatories.

8. This number of interrogatories is warranted under paragraph 2 of subdivision (c) of Section 2030 of the Code of Civil Procedures because the complexity and quantity of issues in the instant lawsuit warrant this number of special interrogatories. Additionally, the interrogatories seek only the identification of the facts, witnesses, and documents which support the allegations in Plaintiff's Complaint and Defendant's potential defenses.

9. None of the requests in this set of special interrogatories is being propounded for any improper purpose, such as to harass the party, or the attorney for the party, to whom it is directed, or to cause unnecessary delay or needless increase in the cost of litigation.

I declare under penalty under the laws of the State of California, that the foregoing is true and correct. Executed on this 13th day of October, 2005, at Irvine, California.

  
\_\_\_\_\_  
SCOTT R. ALBRECHT

**Optima Technology Corp.**

2102 Business Center Drive  
Irvine, CA 92612 USA

California Tax ID No. 1565687  
Federal Tax ID No. 33-0391754

Tel: 949-476-0515  
Fax: 949-476-0613

December 07, 2002

My friend, as requested here is the complete written agreement that was agreed on during our conference call last week, in return for Optima Technology Corp. you agree to provide my working US VISA as a consultant for Optima. As the authorized person of Emfaco and as Mr. Gholam-Reza Zandian, I will in return provide/sell you 88% of Optima stock/ownership of Optima Technology Corp. in return for my VISA. Your signature and the witness who are here signed below prove that you and I are in full agreement with all terms and conditions we worked out.

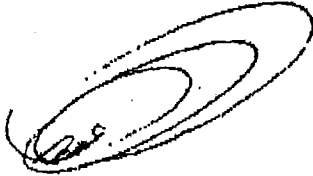
Optima Technology Corp., represented by the CEO and board member Robert M. Adams, Jr. is the legal representative for Optima Technology Corp. All parties including Mr. Gholam-Reza Zandian, as the legal representative for himself and Emfaco and owner of the 88% stock in Optima Technology Corp., agree to the following items:

1. We agree to the sale of Optima Technology Corp. to Robert M. Adams Jr. and his investment partners, to be named at a later date after the Private Placement Memo-(PPM) has been issued.
2. All parties are aware that Optima is a non operating California company with no money, it has no revenue, nor assets other then Trademarks, product source code for DeskTape Pro, CD-R Access Pro, DiskArray Pro and Xchange and one US patent 5,666,531.
3. These assets shall have been turned over to Mr. Adams including the company stock in exchange for my working US Visa.
4. Mr. Zandian agrees and shall assume all prior liabilities of the company that accrued between 1997- December 7, 2002.
5. Mr. Adams agree's to assume all liability for Optima Technology Corp. going forward from today and to honor the 12% of company stock that Matthew Bahrami purchased in 1997-98 yet has failed to completely pay me for.

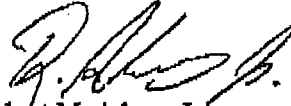
Injunctive Relief. Optima Technology Corp. and Mr. Robert M. Adams, Jr. acknowledges and agrees that money damages would be an inadequate remedy for the injuries and damage that would be suffered by the dishonoring this agreement or any of its representative's breach of this Agreement. Therefore, Mr. Robert M. Adams, Jr. or his companies, besides any other remedies it may have at law or in equity, shall be entitled to injunctive and other equitable relief to enforce the provisions of this Agreement against Mr. Mr. Gholam-Reza Zandian and/or Emfaco.

Governing Law; Waiver of Jury Trial. This Agreement shall be governed by the laws of the State of California, without regard to conflicts of laws provisions. The parties hereto hereby knowingly and voluntarily waive any right which either or both of them shall have to receive a trial by jury with respect to any claims, controversies or disputes which shall arise out of this Agreement or the subject matter hereof.

Dated: 12/07/2002




Gholam-Reza Zadian  
Emfac and himself



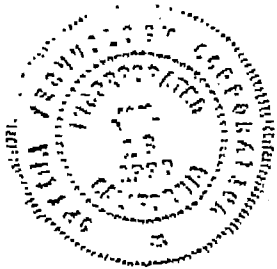
Robert M. Adams Jr.  
CEO Optima Technology Corp.

Witness



JENNEA LEE  
Witness

Optima Technology Corp.  
Corporate Seal



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**PROOF OF SERVICE**

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 19800 MacArthur Blvd., Suite 1000, Irvine, California 92612.

On October 13, 2005, I served the following described as:

**DEFENDANT ROBERT ADAMS' SPECIAL INTERROGATORIES PROPOUNDED TO PLAINTIFF EMFACO, S.A.; DECLARATION FOR ADDITIONAL DISCOVERY [CCP §2030(C)(1)] [SET NO. ONE]**

on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Matthew Murphy, Esq.  
Yoon H. Chang, Esq.  
Gordon & Rees LLP  
4675 MacArthur Court, Suite 800  
Newport Beach, CA 92660  
Tel: (949) 255-6950  
Fax: (949) 474-2060

*Attorneys for Reza Zandian*

(BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

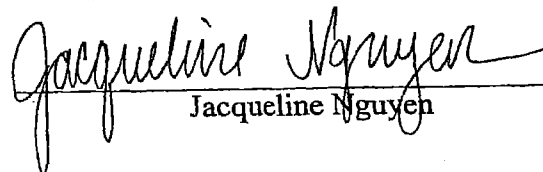
(BY FACSIMILE) I caused such document to be delivered by facsimile transmission to the offices of the addressee.

(BY PERSONAL DELIVERY) I caused such envelope (as specified in the attached service list) to be hand delivered by O.C. Corporate Courier to the offices of the addressee.

(BY OVERNIGHT DELIVERY) I caused such envelope to be delivered by Federal Express to the offices of the addressee

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

EXECUTED on October 13, 2005, at Irvine, California.

  
\_\_\_\_\_  
Jacqueline Nguyen

# Exhibit T

N. RAMSEY BARCIK  
MARK A. NIALIS\*  
CARL J. PENTIS\*  
STEPHEN A. RAINS  
JASON A. SAVLOY  
DANIEL R. WILDISH\*  
\*Partner

OF COUNSEL  
THOMAS R. SALTARELLI  
THOMAS R. WAGNER

## WILDISH & NIALIS

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FACSIMILE (714) 834-3868  
[www.wildishandnialis.com](http://www.wildishandnialis.com)

SAN BERNARDINO COUNTY OFFICE  
685 KENDALL DRIVE, SUITE A-334  
SAN BERNARDINO, CALIFORNIA 92407  
TELEPHONE (909) 337-0303  
FACSIMILE (909) 337-8308

SAN DIEGO COUNTY OFFICE  
3585 EL CAMINO REAL, SUITE 510  
CARLSBAD, CALIFORNIA 92008  
TELEPHONE (760) 726-8668  
FACSIMILE (760) 726-8558

RIVERSIDE COUNTY OFFICE  
23611 WASHINGTON AVE., SUITE C110  
MURRIETA, CALIFORNIA 92562  
TELEPHONE (951) 988-0041  
FACSIMILE (951) 988-8518

August 11, 2006

Mr. Reza Zandian  
8775 Costa Verde Boulevard, No. 1416  
San Diego, CA 92122

Via Fax: (858) 625-2460

Re: Emfacio S.A., etc. vs. Optima Technology Corporation, etc, et al.  
Case No.: O.C.S.C. 06CC08517  
Our File No.: 3579

Dear Mr. Zandian:

I am faxing to you an updated settlement offer from Mr. Adams. He has included the accounting we were seeking.

Should you have any questions regarding the enclosed or any aspect your pending matter, please do not hesitate to contact me.

Very truly yours,

WILDISH & NIALIS

  
CARL J. PENTIS

email: [pmartinez@wildishandnialis.com](mailto:pmartinez@wildishandnialis.com)

Enclosure: 8/11/06 settlement proposal from Adams  
F:\Clients\3579\Corr\Client.07 (settlement offer 081106).wpd



**Robert Adams**

---

**From:** Robert Adams [radams@optimatech.com]  
**Sent:** Friday, August 11, 2006 1:17 PM  
**To:** 'cpentis@wildishandnialls.com'  
**Cc:** 'Scott Albrecht'  
**Subject:** We accept and agree to the term of the settlement discussed today between you and my attorney Scott Albrecht,  
**Attachments:** CW\_20041029\_0302pm\_PST.pdf; sales for 1999-2006.xls

Carl,

I accept and agree to the term of the settlement discussed between you and my attorney Scott Albrecht, here is the requested information and is the same information provided already under oath in the recent Roxio litigation.

Let's just wrap this up ASAP so that parties can go our separate ways as I am tired of this BS and fighting with Zandian.

We are willing to settle all of the outstanding litigation and disputes with Reza on your terms and conditions -- essentially \$12,500.00 - and here is the documentation that you I was told Mr. Zandian was looking for relating to Optima Technology, California:

**Assets:**

1. URL domain [www.optimatech.com](http://www.optimatech.com)
2. Patent 5,666,531
3. Soft 777 licensing agreement for 6% on patent 531\*. not produced a penny yet, See attached file: CW 20041029
4. State of California registration of Company name in California Optima Technology Corp. Fed Tax ID 33-0391754 and State CA Tax ID 1565687
5. Optima Technology Corp. Phone 949-476-0515 and fax 949-476-0613 numbers

**Liabilities:**

A lien against us for \$6-700K, Holland and Knight for Roxio case  
According to our D&B we there is about \$750K in UCC's against us and/or judgments from Reza's past ownership of Optima 1990-1999  
As per Mr. Fish our recent Attorney who blew the appeal says Optima owes him \$30k  
As per Mr. Fish, he says the attorneys for Roxio have a judgment for \$8-10k against Optima Technology Corp.  
That means we owe out about \$1.48 to \$1.59 million in debts

**Income received from product sales or asset sales since Dec 2002**

\$225,000.00\* on 30 Apr 2004 sales of rights to Soft777 for trademark names, any source code (none) and to develop and own Deskape, CD R Access, Xchange Pro.

\$26,836.13 Sales for 1999-2006, see attached excel sheet Sales for 1999-2006

**Notes:**

\*1. Money from 2004 sale for software to Soft 777 was used to retain and pay Holland & Knight and experts

Thank you,

Robert Adams  
CEO, Optima Technology  
949-476-0515 Phone  
949-476-0613 Fax

Simply Smarter Storage & Encryption Software Solutions since 1990!

The information contained in this e-mail and any attachments are legally privileged or confidential. If you are not an intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender and permanently delete the e-mail and any attachments immediately. You should not retain, copy or use this e-mail or any attachment for any purpose, nor disclose all or any part of the contents to any other person. Thank you.