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8 Attorney for Petitioner, Helen Su Irving-Yan

9
10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**
12 **LAMOREAUX JUSTICE CENTER**

13 HELEN SU IRVING-YAN,

14 Petitioner,

15 and

16 KELVIN YAN,

17 Respondent.

CASE NO.: 21D003196

ASSIGNED FOR ALL PURPOSES TO:
Judge Israel Claustro
Dept. C22

PETITIONER'S REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET THREE (3), TO RESPONDENT

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20 DEMANDING PARTY: Petitioner, HELEN SU IRVING-YAN

21 RESPONDING PARTY: Respondent, KELVIN YAN

22 SET NO.: THREE (3)

23 TO RESPONDENT, KELVIN YAN, AND HIS ATTORNEY OF RECORD:

24 You are hereby requested to produce the following described documents for
25 inspection and copying, pursuant to California Code of Civil Procedure section 2031.010 *et*
26 *seq.*
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1 Please produce and permit the inspection, copying, or photocopying by THE LAW
2 OFFICE OF LAUREN MULLEE, or its agents on behalf of the demanding party, all
3 documents and things identified in your written response. There may be full compliance
4 with this request by forwarding copies of said documents and things to THE LAW OFFICE
5 OF LAUREN MULLEE, One Park Plaza, Suite 600, Irvine, California 92614, via electronic
6 service at 10:00 a.m. within thirty (30) days of service of this Request.

7 A personal appearance by the responding party is not required if the responding
8 party will submit copies of the above-noted records with a verification, executed under
9 penalty of perjury, and that the copies provided are accurate and true copies of the
10 complete records requested.

11 Full compliance with this Request will require production of actual photographs or
12 negatives, if requested. Prints will be made at our expense and all photographs returned
13 immediately thereafter. Photocopies of any requested photographs will not be deemed
14 compliant with this Request.

15 PLEASE NOTE: This section requires two acts for compliance with this Request:

- 16 (a) Service of a written response under oath, within thirty-five (35) days if served
17 by mail, thirty-two (32) days if served by next day delivery, or thirty (30) days
18 if served by personal delivery or via electronic mail.
- 19 (b) Production of tangible things on or before the date set forth herein.

20 The following described documents are believed to be in the possession, custody, or
21 control of the responding party or the attorney of record and are not privileged and are
22 relevant to the subject matter of this action and are reasonably calculated to lead to this
23 discovery of admissible evidence in this action.

24 Responding party is cautioned that in the event responding party fails to respond to
25 this Request for Production of Documents, thereby necessitating a formal Motion to
26 Compel Production of the requested documents, the Court has the power to impose
27 sanctions and award the reasonable costs and attorneys' fees to the demanding party in
28 connection with the Motion.

REQUEST FOR PRODUCTION OF DOCUMENTS, SET THREE (3)

PERSONAL DOCUMENTS

Request No. 1.

Personal federal and state income tax returns of Kelvin Yan, filed individually and jointly with any other person for the years 2023, and 2024, including all Form W-2s and Schedule K-1s.

Request No. 2.

[If the 2024 personal income tax return of Kelvin Yan has not yet been prepared:] All tax reporting form to be used to prepare the 2024 personal income tax return of Kelvin Yan, including Form W-2s, 1099s, 1098s, Schedule K-1s.

Request No. 3.

All writings evidencing earnings statements or pay stubs of Kelvin Yan from any entity reflecting year-to-date information for the year ended December 31, 2024.

Request No. 4.

All writings evidencing earnings statements or pay stubs of Kelvin Yan from any entity reflecting year-to-date information for the period January 1, 2025, through current.

Request No. 5.

All documents evidencing or regarding Bank of America savings account x0542, including but not limited to statements, canceled checks, and deposit backup, for the period April 23, 2024, through the date of production.

Request No. 6.

All documents evidencing or regarding Bank of America checking account x4781, including but not limited to statements and canceled checks, for the period April 23, 2024, through

1 the date of production, and deposit backup for the period August 1, 2020, through the date
2 of production.

3
4 Request No. 7.

5 All documents evidencing or regarding Bank of America account x5201, including but not
6 limited to statements for the period August 30, 2023, through the date of production, and
7 canceled checks and deposit backup for the period June 30, 2021 through December 29,
8 2021, and March 30, 2023, through the date of production.

9
10 Request No. 8.

11 All documents evidencing or regarding Bank of America checking account x7654, including
12 but not limited to statements for the period January 18, 2024, through the date of
13 production, and canceled checks and deposit backup for the period August 1, 2020,
14 through the date of production.

15 Request No. 9.

16 All documents evidencing or regarding any financial accounts, including but not limited to
17 statements, canceled checks, and deposit backup for all checking, savings, money market,
18 and credit union accounts held in the name of Kelvin Yan, individually or jointly with any
19 other person or entity, for the period August 1, 2020, through the date of production, unless
20 provided in response to other Requests herein, and excluding the following, which has
21 already been provided:

- 22 - E*Trade savings account x3200 (Kelvin Yan)
- 23 - E*Trade savings account x9714 (Kelvin Yan)
- 24 - Bank of America account x1863 (Kelvin Yan & Titus Ho Hohung)
- 25 - Bank of America account x2219 (Kelvin Yan & Titus Ho Hohung)
- 26 - Bank of America minor savings account x5240 (Kelvin Yan & Kory Yan)

1 Request No. 10.

2 All documents evidencing or regarding E*Trade account x1282, for the period February 1,
3 2024, through December 31, 2024, and April 1, 2025, through the date of production.

4
5 Request No. 11.

6 All documents evidencing or regarding E*Trade account x2287 for the period April 1, 2023,
7 through the date of production.

8
9 Request No. 12.

10 All documents evidencing or regarding E*Trade account x2728 for the period April 1, 2023,
11 through the date of production.

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13 Request No. 13.

14 All documents evidencing or regarding E*Trade account x3126 for the period February 1,
15 2024, through April 30, 2025, and June 1, 2025, through the date of production.

16
17 Request No. 14.

18 All documents evidencing or regarding E*Trade account x3564 for the period April 1, 2023,
19 through the date of production.

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21 Request No. 15.

22 All documents evidencing or regarding E*Trade account x7945 for the period April 1, 2023,
23 through the date of production.

24
25 Request No. 16.

26 All documents evidencing or regarding E*Trade account x8042 for the period April 1, 2023,
27 through the date of production.

28

1 Request No. 17.

2 All documents evidencing or regarding any brokerage and investment accounts held in the
3 name of Kelvin Yan, individually or jointly with any other person or entity, for the period
4 August 1, 2020, through the date of production unless otherwise produced in response to
5 other Requests herein and excluding the following:

- 6 - E*Trade account x8666 (Kelvin Yan C/F Kurtis Yan)
- 7 - E*Trade account x0486 (Kelvin Yan C/F Kory Yan)
- 8 - Merrill Lynch / Bank of America account x8H51 (Kelvin Yan & Kristy Yan)
- 9 - Merrill Lynch / Bank of America x8H52 (Kelvin Yan FBO Kory Yan)
- 10 - Merrill Lynch / Bank of America x8H53 (Kelvin Yan C/F Kurtis Yan)

11 Request No. 18.

12 All documents evidencing or regarding American Funds / Kanex 401(k) account x0665, for
13 the period April 1, 2024, through the date of production.

15 Request No. 19.

16 All documents evidencing or regarding E*Trade IRA Contributory account x1017, for the
17 period February 1, 2024, through December 31, 2024, and April 1, 2025, through the date
18 of production.

20 Request No. 20.

21 Load Karma, Inc. 401(k) account x4X77, for the period July 1, 2023, through September
22 30, 2023, and January 1, 2024, through the date of production.

24 Request No. 21.

25 All documents evidencing or regarding all retirement accounts (IRA, Keogh, Pension Plan,
26 401(k) Profit Sharing Plan, etc.), not already produced in response to other Requests
27 herein, held in the name of Kelvin Yan, individually or jointly with any other person or entity,

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1 for the period of August 1, 2020, through the date of production, excluding documents that
2 have been produced in response to other Requests herein, and excluding the following:

- 3 - E*Trade Roth IRA for Minors account x4173 (Kelvin Yan C/F Kurtis Yan)
- 4 - E*Trade Roth IRA for Minors account x4177 (Kelvin Yan C/F Kory Yan)
- 5 - E*Trade Roth IRA for Minors account x4308 (Kelvin Yan C/F Kristy Yan)

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7 Request No. 22.

8 All statements for American Express Platinum Card account x2004 for the period August
9 21, 2020, through the date of production.

10 Request No. 23.

11 All documents evidencing or regarding Allianz IUL Policy x7425, including but not limited to
12 life insurance declaration page with cash surrender values and loan values, premium
13 notices, and all statements, for the period August 1, 2020, through August 1, 2022, and
14 August 2, 2023, through the date of liquidation.

15
16 Request No. 24.

17 All documents evidencing or regarding John Hancock Term Policy account x8804, including
18 but not limited to statements for the period August 1, 2020, through November 13, 2023,
19 and November 14, 2023, through the date of production.

20
21 Request No. 25.

22 All documents evidencing or regarding any insurance policy that Kelvin Yan owns or for
23 which he is the beneficiary, including but not limited to life insurance declaration page(s)
24 with cash surrender values and loan values, premium notices, and all statements, from the
25 period August 1, 2020, through the date of production, excluding documents already
26 produced in response to other Requests herein.

1 Request No. 26.

2 All documents evidencing or regarding trust agreements and amendments thereto,
3 including a listing of all assets and liabilities held by the trust of the *2013 Yan Family Trust*
4 *dated December 11, 2013.*

5
6 Request No. 27.

7 All documents evidencing or regarding the Bank of America HELOC account x6600 re:
8 2810 Domingo Road in Fullerton, California, including but not limited to all mortgage, loan,
9 and HELOC statements.

10 Request No. 28.

11 All documents evidencing or regarding Flagstar Bank Mortgage x9705 re: 2984 E. Stearns
12 St. in Brea, California, including but not limited to mortgage, loan, and HELOC statements.

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14 Request No. 29.

15 All documents evidencing or regarding the real property located at 578 S. Brea Blvd. in
16 Brea, California, including but not limited to mortgage, loan, and HELOC statements.

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18 Request No. 30.

19 All documents evidencing or regarding mortgage, loan, and HELOC statements for all real
20 property owned by Kelvin Yan individually or jointly with any other person or entity as of the
21 date of production, excluding any documents already provided in response to other
22 Requests herein.

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24 Request No. 31.

25 The current loan statement for the 2013 Tesla Model S, vehicle identification number
26 ending x1183.

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1 Request No. 32.

2 The current loan statement or Certificate of Title for the 2020 Tesla Model S, vehicle
3 identification number ending x3472.

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5 Request No. 33.

6 The current loan statement or Certificate of Title for the 2022 Tesla Model Y, vehicle
7 identification number ending x0075.

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9 Request No. 34.

10 The current loan statement or Certificate of Title for the 2022 Tesla Model Y, vehicle
11 identification number ending x1519.

12 Request No. 35.

13 The current loan statement for the 2020 BMW X5, vehicle identification number ending
14 x0681.

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16 Request No. 36.

17 All documents evidencing or regarding lease agreements, certificates of ownership (pink
18 slips), and current loan statements for all vehicles, including but not limited to automobiles,
19 motorcycles, watercraft, aircraft, or other vehicles, held in the name of Kelvin Yan,
20 individually or jointly with any other person or entity, during the period August 1, 2020,
21 through the date of production, other than documents already produced in response to
22 other Requests herein.

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24 Request No. 37.

25 All documents evidencing or regarding all post-separation payments made by Kelvin Yan,
26 after August 1, 2020, through the date of production, made on his spouse's behalf or for
27 reducing community debt, including but not limited to mortgage payments, bank
28

1 statements, canceled checks, correspondence, and agreements, and excluding documents
2 described in other Requests herein.

3
4 Request No. 38.

5 Documents evidencing or regarding income from any source not included on any tax return
6 or otherwise requested herein in other Requests, of Kelvin Yan, individually or jointly with
7 any other person or entity, for the period August 1, 2020, through the date of production.

8
9 BUSINESS DOCUMENTS: KANEX AND KANEX PRO, INC.

10 Request No. 39.

11 Income tax returns for the year 2023 and the year 2024, when and if filed, for Kanex.

12 Request No. 40.

13 Income tax returns for the year 2023 and the year 2024, when and if filed, for Kanex Pro,
14 Inc.

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16 Request No. 41.

17 Quickbooks data file, without passwords, or any other computer software data files, which
18 would detail the business transactions for the period January 1, 2018, through the date of
19 production, for Kanex.

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21 Request No. 42.

22 If the Quickbooks data file is not produced, then all financial documents for Kanex,
23 including but not limited to (1) complete income statements for the years 2019 through
24 2024 (excluding summary statements for 2019 through 2022 and detailed income
25 statement through November 30, 2023); (2) balance sheets as of December 31, 2023,
26 December 31, 2024, and the last month completed in 2025; (3) complete annual general
27 ledgers for the years 2023 and 2024 and the period January 1, 2025, through the last
28 month completed in 2025; and (4) general journals (or other records supporting the general

1 ledgers) for the years 2020 through 2024 and the period January 1, 2025, through the last
2 month completed in 2025. *Note: descriptions are missing for various line items in the*
3 *general ledgers already provided, specifically as it relates to lines where the "Type" of*
4 *transaction is listed as "OTHER."*

5
6 Request No. 43.

7 Quickbooks data file, without passwords, or any other computer software data files, which
8 would detail the business transactions for the period January 1, 2018, through the date of
9 production, for Kanex Pro, Inc.

10 Request No. 44.

11 If the Quickbooks data file is not produced, then all financial documents for Kanex Pro, Inc.,
12 including but not limited to (1) complete income statements for the years 2023 and 2024;
13 (2) balance sheets as of December 31, 2024, and the last month completed in 2025; (3)
14 complete annual general ledgers for the years 2023 and 2024 and the period January 1,
15 2025, through the last month completed in 2025 (*note: the 2023 general ledger previously*
16 *provided only contains expense categories*); and (4) general journals (or other records
17 supporting the general ledgers) for the years 2020 through 2024 and the period January 1,
18 2025, through the last month completed in 2025. *Note: descriptions are missing for various*
19 *line items in the general ledgers already provided, specifically as it relates to lines where*
20 *the "Type" of transaction is listed as "OTHER."* This Request excludes the Vendor
21 Outgoing Payments from January 1, 2019, through June 16, 2023.

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23 Request No. 45.

24 Detailed aged listing of accounts receivable for Kanex as of December 31, 2024, and as of
25 the date of production for the latest month completed in 2025.
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1 Request No. 46.

2 Detailed aged listing of accounts receivable for Kanex Pro, Inc. as of December 31, 2024,
3 and as of the date of production for the latest month completed in 2025.

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5 Request No. 47.

6 Accounts payable aging detail information for Kanex, as of December 31, 2024, and as of
7 the date of production (latest month completed in 2025).

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9 Request No. 48.

10 Accounts payable aging detail information for Kanex Pro, Inc., as of December 31, 2024,
11 and as of the date of production (latest month completed in 2025).

12
13 Request No. 49.

14 All documents that evidence or regard inventory listings for Kanex, including fair market
15 values, as of December 31, 2024, and as of the date of production (latest month completed
16 in 2025).

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18 Request No. 50.

19 All documents that evidence or regard inventory listings for Kanex Pro, Inc., including fair
20 market values, as of December 31, 2024, and as of the date of production (latest month
21 completed in 2025).

22
23 Request No. 51.

24 All documents that evidence or regard a detail of fixed assets of Kanex, as of December
25 31, 2024, and as of the date of production, including but not limited to a description of each
26 asset, original cost of the asset, and the date the asset was purchased.
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1 Request No. 52.

2 All documents that evidence or regard a detail of fixed assets of Kanex Pro, Inc., as of
3 December 31, 2024, and as of the date of production, including but not limited to a
4 description of each asset, original cost of the asset, and the date the asset was purchased.

5
6 Request No. 53.

7 All documents evidencing or regarding all intellectual property, including patents,
8 trademarks, and copyrights held by Kanex as of December 31, 2022, through the date of
9 production, excepting all documents already provided.

10 Request No. 54.

11 All documents evidencing or regarding all intellectual property, including patents,
12 trademarks, and copyrights held by Kanex Pro, Inc. as of December 31, 2022, through the
13 date of production, excepting all documents already provided.

14
15 Request No. 55.

16 All documents evidencing or regarding compensation for all employees and independent
17 contractors of Kanex, including but not limited to Forms W-2, Forms 1099, quarterly payroll
18 tax returns, earnings statements, payroll registers, or any other reports, for the period
19 January 1, 2023, through the date of production.

20
21 Request No. 56.

22 All documents evidencing or regarding compensation for all employees and independent
23 contractors of Kanex Pro, Inc., including but not limited to Forms W-2, Forms 1099,
24 quarterly payroll tax returns, earnings statements, payroll registers, or any other reports, for
25 the period January 1, 2019, through September 30, 2022, and April 17, 2024, through the
26 date of production.

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1 Request No. 57.

2 All documents evidencing or regarding Kanex business bank account Bank of America
3 x2098, including but not limited to statements, cancelled checks, and deposit back up, for
4 the period February 1, 2024, through the date of production.

5
6 Request No. 58.

7 All documents evidencing or regarding Kanex Pro, Inc. business bank account Bank of
8 America account x8123, including but not limited to statements, cancelled checks, and
9 deposit back up, for the period February 1, 2024, through the date of production.

10 Request No. 59.

11 All documents evidencing or regarding American Express account x2001 (Kanex Pro, Inc. /
12 Kelvin Yan), including but not limited to statements for the period March 26, 2024, through
13 the date of production, and reconciliation reports for the period August 1, 2020, through
14 December 31, 2022, and January 1, 2024, through the date of production.

15
16 Request No. 60.

17 All documents evidencing or regarding American Express account x6007 (Kanex)
18 statements for the period May 3, 2023, through the date of production.

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20 Request No. 61.

21 All documents evidencing or regarding all business credit card accounts for Kanex,
22 including but not limited to statements, and workpapers or documents reconciling the
23 company credit cards with the general ledger, or Quickbooks file, for the period of August 1,
24 2020, through the date of production, and excluding any documents produced in response
25 to other Requests herein.
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1 Request No. 62.

2 All documents evidencing or regarding all business credit card accounts for Kanex Pro,
3 Inc., including but not limited to statements, and workpapers or documents reconciling the
4 company credit cards with the general ledger, or Quickbooks file, for the period of August 1,
5 2020, through the date of production, and excluding any documents produced in response
6 to other Requests herein.

7
8 Request No. 63.

9 All documents evidencing or regarding Small Business Association Loan x7410 (Kanex),
10 including but not limited to applications, agreements, and loan statements for January
11 2021, March 2021 through October 2022, July 2023 through May 2025, and July 2025
12 through the date of production.

13 Request No. 64.

14 All documents evidencing or regarding Small Business Association Loan x7806 (Kanex
15 Pro, Inc.), including but not limited to applications, agreements, and loan statements for
16 August 2020 through January 2021, March 2021 through May 2025, and July 2025 through
17 the date of production.

18
19 Request No. 65.

20 All documents evidencing or regarding any debt of Kanex, including but not limited to all
21 loan statements, applications, agreements, promissory notes, and amortization schedules,
22 for the period August 1, 2020 through the date of production, excepting any documents
23 produced in response to other Requests herein.

24
25 Request No. 66.

26 All documents evidencing or regarding any debt of Kanex Pro, Inc., including but not limited
27 to all loan statements, applications, agreements, promissory notes, and amortization
28

1 schedules, for the period August 1, 2020 through the date of production, excepting any
2 documents produced in response to other Requests herein.

3
4 Request No. 67.

5 All documents evidencing or regarding annual summaries of the Kanex employer portion of
6 any contributions made to any retirement accounts, including but not limited to pension and
7 profit sharing plan(s), for the benefit of the parties, by year, for the period January 1, 2021,
8 through the date of production.

9
10 Request No. 68.

11 All documents evidencing or regarding annual summaries of the Kanex Pro, Inc. employer
12 portion of any contributions made to any retirement accounts, including but not limited to
13 pension and profit sharing plan(s), for the benefit of the parties, by year, for the period
14 January 1, 2021, through the date of production.

15
16 Request No. 69.

17 All documents evidencing or regarding distributions that Kelvin Yan received from any
18 entity, including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for the
19 years 2021 through 2024, and January 1, 2025, through the date of production.

20
21 Request No. 70.

22 All documents evidencing or regarding draws that Kelvin Yan received from any entity,
23 including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for the years
24 2021 through 2024, and January 1, 2025, through the date of production.

25
26 Request No. 71.

27 All documents evidencing or regarding expense reimbursements that Kelvin Yan received
28 from any entity, including but not limited to either Kanex or Kanex Pro, Inc., or both, by

1 year, for the years 2021 through 2024, and January 1, 2025, through the date of
2 production.

3
4 Request No. 72.

5 All documents evidencing or regarding allowances that Kelvin Yan received from any entity,
6 including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for the years
7 2021 through 2024, and January 1, 2025, through the date of production.

8
9 Request No. 73.

10 All documents evidencing or regarding distributions that Helen Irving-Yan received from
11 any entity, including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for
12 the years 2021 through 2024, and January 1, 2025, through the date of production.

13
14 Request No. 74.

15 All documents evidencing or regarding draws that Helen Irving-Yan received from any
16 entity, including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for the
17 years 2021 through 2024, and January 1, 2025, through the date of production.

18
19 Request No. 75.

20 All documents evidencing or regarding expense reimbursements that Helen Irving-Yan
21 received from any entity, including but not limited to either Kanex or Kanex Pro, Inc., or
22 both, by year, for the years 2021 through 2024, and January 1, 2025, through the date of
23 production.

24
25 Request No. 76.

26 All documents evidencing or regarding allowances that Helen Irving-Yan received from any
27 entity, including but not limited to either Kanex or Kanex Pro, Inc., or both, by year, for the
28 years 2021 through 2024, and January 1, 2025, through the date of production.

1 Request No. 77.

2 All documents evidencing or regarding any capital contributions to Kanex made by Kelvin
3 Yan by year, for the years 2021 through 2024, and January 1, 2025, through the date of
4 production.

5
6 Request No. 78.

7 All documents evidencing or regarding any capital contributions to Kanex Pro, Inc. made by
8 Kelvin Yan, by year, for the years 2021 through 2024, and January 1, 2025, through the
9 date of production.

10 Request No. 79.

11 All documents evidencing or regarding any capital contributions to Kanex made by Helen
12 Irving-Yan by year, for the years 2021 through 2024, and January 1, 2025, through the date
13 of production.

14
15 Request No. 80.

16 All documents evidencing or regarding any capital contributions to Kanex Pro, Inc. made by
17 Helen Irving-Yan by year, for the years 2021 through 2024, and January 1, 2025, through
18 the date of production.

19
20 Request No. 81.

21 All documents regarding or evidencing all personal expenses (including but not limited
22 expenses that are a mixture of personal and business, *i.e.*, automobile expenses, meals,
23 entertainment, and cellular phone) paid through Kanex for the benefit of either Kelvin Yan
24 or Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1,
25 2025, through the date of production, including but not limited to expense descriptions and
26 amounts by entity that paid the expenses.

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1 Request No. 82.

2 All documents regarding or evidencing all personal expenses (including but not limited
3 expenses that are a mixture of personal and business, *i.e.*, automobile expenses, meals,
4 entertainment, and cellular phone) paid through Kanex Pro, Inc. for the benefit of either
5 Kelvin Yan or Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and
6 January 1, 2025, through the date of production, including but not limited to expense
7 descriptions and amounts by entity that paid the expenses.

8
9 Request No. 83.

10 All documents regarding or evidencing all insurance premium notices for all insurance
11 policies for Kanex, including but not limited to all medical, disability, life, equipment,
12 automobile, liability, and umbrella policies in effect during the period January 1, 2021,
13 through the date of production, excluding California Choice account x5729 premium
14 statement for February 2022.

15 Request No. 84.

16 All documents regarding or evidencing all insurance premium notices for all insurance
17 policies for Kanex Pro, Inc., including but not limited to all medical, disability, life,
18 equipment, automobile, liability, and umbrella policies in effect during the period January 1,
19 2021, through the date of production, excluding California Choice account x5729 premium
20 statement for February 2022.

21
22 Request No. 85.

23 All lease agreements for Kanex, including but not limited to office and equipment leases in
24 effect during the period January 1, 2018, through the date of production.

25
26 Request No. 86.

27 All lease agreements for Kanex Pro, Inc., including but not limited to office and equipment
28 leases in effect during the period January 1, 2018, through the date of production,

1 excluding the Commercial Lease Agreement for 512 S. Brea Blvd., dated November 9,
2 2020.

3
4 Request No. 87.

5 All shareholder agreements and all amendments thereto, corporate formation documents,
6 minutes, etc., since the inception of Kanex, excluding all documents previously provided, if
7 any.

8
9 Request No. 88.

10 All shareholder agreements and amendments thereto, corporate formation documents,
11 minutes, etc., since the inception of Kanex Pro, Inc., excluding all documents previously
12 provided, if any.

13
14 Request No. 89.

15 All business agreements or contracts between Kanex, on the one hand, and any third party
16 person(s) or entity(ies), on the other hand, in effect as of December 31, 2022, December
17 31, 2023, December 31, 2024, and the date of production.

18
19 Request No. 90.

20 All business agreements or contracts between Kanex Pro, Inc., on the one hand, and any
21 third party person(s) or entity(ies), on the other hand, in effect as of December 31, 2022,
22 December 31, 2023, December 31, 2024, and the date of production.

23
24 Request No. 91.

25 All valuation reports for Kanex from the date of the entity's inception through the date of
26 production, if any.
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1 Request No. 92.

2 All valuation reports for Kanex Pro, Inc. from the date of the entity's inception through the
3 date of production, if any.

4
5 Request No. 93.

6 All documents evidencing or regarding the sale, transfer, or dissolution of Kanex or part of
7 Kanex since the entity's inception, including but not limited to documents evidencing any
8 transfers of funds related to such a transaction.

9
10 Request No. 94.

11 All documents evidencing or regarding the sale, transfer, or dissolution of Kanex Pro, Inc.
12 or part of Kanex Pro, Inc. since the entity's inception, including but not limited to documents
13 evidencing any transfers of funds related to such a transaction.

14 Request No. 95.

15 Access to for inspection of paid bill files and invoices for the period January 1, 2021,
16 through the date of production for Kanex.

17
18 Request No. 96.

19 Access to for inspection of paid bill files and invoices for the period January 1, 2021,
20 through the date of production for Kanex Pro, Inc.

21
22 BUSINESS DOCUMENTS – LOAD KARMA, INC.

23 Request No. 97.

24 Load Karma, Inc.'s Corporate Income Tax Return for the years 2023 and 2024, when and if
25 available.

1 Request No. 98.

2 Load Karma, Inc.'s QuickBooks data file, including all transactions for the period August 1,
3 2020, through the date of production. As an alternative to the Quickbooks data file, all
4 financial reports for Load Karma, Inc., including but not limited to: (1) annual financial
5 statements, including year-end balance sheet and annual profit and loss statement, for the
6 year 2024; (2) Interim Profit & Loss Statement for the period January 1, 2025, through the
7 latest month completed in 2025; (3) balance sheet as of the latest month completed in
8 2025; and (4) detailed general ledgers for the years 2023, 2024, and the period January 1,
9 2025, through the last month completed in 2025, excepting Profit & Loss detail report for
10 the year 2023.

11 Request No. 99.

12 Detailed aged listing of accounts receivable for Load Karma, Inc., as of December 31,
13 2022, December 31, 2024, and as of the date of production (latest month completed in
14 2025).

15
16 Request No. 100.

17 All documents that evidence or regard the collectability of receivables for Load Karma, Inc.,
18 as of December 31, 2022, December 31, 2024, and as of the date of production (latest
19 month completed in 2025).

20
21 Request No. 101.

22 All documents that evidence or regard accounts payable aging detail information of Load
23 Karma, Inc., as of December 31, 2022, December 31, 2024, and as of the date of
24 production (latest month completed in 2025).

1 Request No. 102.

2 All documents evidencing or regarding any detailed inventory listing for Load Karma, Inc.,
3 including fair market values, as of December 31, 2022, December 31, 2023, December 31,
4 2024, and as of the date of production (latest month completed in 2025).

5
6 Request No. 103.

7 All documents evidencing or regarding any detail of fixed assets of Load Karma, Inc. as of
8 December 31, 2023, December 31, 2024, and as of the date of production, including but
9 not limited to a description of each asset, the original cost of the asset and the date the
10 asset was purchased.

11 Request No. 104.

12 All documents evidencing or regarding all business bank statements for Load Karma, Inc.,
13 from inception through the date of production, including but not limited to Bank of America
14 account x8759 statements for the period February 1, 2024, through the date of production.

15
16 Request No. 105.

17 All documents evidencing or regarding all business credit card accounts for Load Karma,
18 Inc., including but not limited to all business credit card statements and all credit cards of
19 either or both Kelvin Yan and Helen Irving-Yan paid through Load Karma, Inc., workpapers
20 or documents reconciling company credit cards with the general ledger or QuickBooks file,
21 including but not limited to the following:

- 22 - Bank of America account x7266 statements for the period February 12, 2024,
23 through the date of production; and
 - 24 - American Express x1006 statements for the period January 29, 2024, through the
25 date of production.
- 26
27
28

1 Request No. 106.

2 All insurance premium notices for all insurance policies for Load Karma, Inc., including but
3 not limited to medical, disability, life, equipment, automobile, liability, and umbrella policies
4 in effect from inception through the date of production.

5
6 Request No. 107.

7 All lease agreements for Load Karma, Inc., including but not limited to office and equipment
8 leases in effect from inception through the date of production.

9
10 Request No. 108.

11 Annual summaries of the employer portion of any contributions made by Load Karma, Inc.
12 to any retirement accounts, including but not limited to pension and profit sharing plan(s),
13 for the benefit of Kelvin Yan or Helen Irving-Yan or both, by year, from inception through
14 the date of production.

15 Request No. 109.

16 All documents evidencing or regarding any capital contributions made by Kelvin Yan to
17 Load Karma, Inc. for the years 2021 through 2024, and January 1, 2025, through the date
18 of production.

19
20 Request No. 110.

21 All documents evidencing or regarding any capital contributions made by Helen Irving-Yan
22 to Load Karma, Inc. for the years 2021 through 2024, and January 1, 2025, through the
23 date of production.

24
25 Request No. 111.

26 All documents evidencing or regarding loan agreements by and between Load Karma, Inc.,
27 on the one hand, and any other person or entity on the other hand, including but not limited
28

1 to amortization schedules, in effect during the period January 1, 2021, through the date of
2 production.

3
4 Request No. 112.

5 All documents evidencing or regarding personal expenses paid through Load Karma, Inc.
6 for the benefit of Kelvin Yan or Helen Irving-Yan, or both, for the years 2021 through 2024,
7 and January 1, 2025, through the date of production.

8
9 Request No. 113.

10 All shareholder agreements, including all amendments thereto, and minutes since the
11 inception of Load Karma, Inc., excluding Bylaws dated June 20, 2021, Minutes and
12 Resolutions dated June 20, 2021, and Minutes and Resolutions dated December 1, 2021.

13
14 Request No. 114.

15 All business agreements or contracts between Load Karma, Inc., on the one hand, and any
16 other person or entity, on the other hand, in effect as of December 31, 2022, December 31,
17 2023, December 31, 2024, and the date of production.

18
19 Request No. 115.

20 All documents evidencing or regarding the sale, transfer, or dissolution of Load Karma, Inc.
21 or part of Load Karma, Inc., since inception, including but not limited to any transfers of
22 funds related to any such transaction, excluding Stock Certificate Ledger dated June 20,
23 2021, and Stock Certificates 1 through 4, dated February 11, 2022.

24
25 Request No. 116.

26 All documents regarding or evidencing all previous valuation reports for Load Karma, Inc.
27 from inception through the date of production.
28

1 Request No. 117.

2 Access to for inspection of paid bill files and invoices from the inception of Load Karma, Inc.
3 through the date of production.

4
5 BUSINESS DOCUMENTS – OTHER ENTITIES

6 Request No. 118.

7 Income tax returns for the year 2023 and the year 2024 for all businesses not already
8 produced in response to other Requests herein, including but not limited to:

- 9 - Sydnee Properties, LLC
- 10 - Sydnee, Inc.
- 11 - Sydnee, LLC
- 12 - Sydnee 578 LLC
- 13 - Sydnee Fund, LP
- 14 - Sydnee X, Inc.
- 15 - iOLO Capital Inc.

16 Request No. 119.

17 QuickBooks data file for Sydnee Properties, LLC, including transactions for the period
18 August 1, 2020, through the date of production. In the alternative to the QuickBooks data
19 file, produce all financial documents for Sydnee Properties, LLC, including but not limited to
20 (1) annual financial statements, including year-end balance sheet and annual profit and
21 loss statement, for the year 2024; (2) Interim Profit & Loss for the period January 1, 2025,
22 through the latest month completed in 2025; (3) balance sheet as of the last month
23 completed in 2025; (4) detail general ledgers for the years 2020, 2024, and the period
24 January 1, 2025, through the latest month completed in 2025.

25
26 Request No. 120.

27 Quickbooks data file for Sydnee, Inc., including transactions for the period August 1, 2020,
28 through the date of production. In the alternative to the Quickbooks data file, produce all

1 financial documents for Sydnee, Inc., including but not limited to (1) annual financial
2 statements, including year-end balance sheet and annual profit and loss statement, for the
3 year 2024; (2) Interim Profit & Loss for the period January 1, 2025, throughout the latest
4 month completed in 2025; (3) balance sheet as of the last month completed in 2025; (4)
5 detail general ledgers for the years 2020, 2024, and the period January 1, 2025, through
6 the latest month completed in 2025.

7
8 Request No. 121.

9 Quickbooks data file for Sydnee, LLC, including transactions for the period August 1, 2020,
10 through the date of production. In the alternative to the Quickbooks data file, produce all
11 financial documents for Sydnee, LLC, including but not limited to detailed general ledger for
12 the year 2020.

13 Request No. 122.

14 Quickbooks data file for Sydnee 578 LLC, including transactions for the period August 1,
15 2020, through the date of production. In the alternative to the Quickbooks data file,
16 produce all financial documents for Sydnee 578 LLC, including but not limited to (1) annual
17 financial statements, including year-end balance sheets and annual profit and loss
18 statements, for the years 2023 and 2024; (2) Interim Profit & Loss for the period January 1,
19 2025, through the latest month completed in 2025; (3) balance sheet as of the last month
20 completed in 2025; (4) detail general ledgers for the years 2020, 2024, and the period
21 January 1, 2025, through the latest month completed in 2025.

22
23 Request No. 123.

24 Quickbooks data file for Sydnee Fund LP, including transactions for the period August 1,
25 2020, through the date of production. In the alternative to the Quickbooks data file,
26 produce all financial documents for Sydnee Fund LLP, including but not limited to (1)
27 annual financial statements, including year-end balance sheets and annual profit and loss
28 statements, for the years 2022 through 2024; (2) Interim Profit & Loss for the period

1 January 1, 2025, through the latest month completed in 2025; (3) balance sheet as of the
2 last month completed in 2025; (4) detail general ledgers for the years 2022 through 2024
3 and the period January 1, 2025, through the latest month completed in 2025.

4
5 Request No. 124.

6 Quickbooks data file for Sydnee X, Inc., including transactions for the period August 1,
7 2020, through the date of production. In the alternative to the Quickbooks data file,
8 produce all financial statements for Sydnee X, Inc., including but not limited to (1) annual
9 financial statements, including year-end balance sheets and annual profit and loss
10 statements, for the years 2022 through 2024; (2) Interim Profit & Loss for the period
11 January 1, 2025, through the latest month completed in 2025; (3) balance sheet as of the
12 last month completed in 2025; (4) detail general ledgers for the years 2022 through 2024,
13 and the period January 1, 2025, through the latest month completed in 2025.

14 Request No. 125.

15 Quickbooks data file for iOLO Capital Inc., including transactions for the period August 1,
16 2020, through the date of production. In the alternative to the Quickbooks data file, then
17 produce all financial statements for iOLO Capital Inc., including but not limited to (1) annual
18 financial statements, including year-end balance sheet and annual profit and loss
19 statement, for the year 2024; (2) Interim Profit & Loss for the period January 1, 2025,
20 through the latest month completed in 2025; (3) balance sheet as of the last month
21 completed in 2025; and (4) detailed general ledger for the year 2020, 2024, and the period
22 January 1, 2025, through the latest month completed in 2025.

23
24 Request No. 126.

25 Business agreements of any other documents evidencing or reflecting the name of all the
26 shareholders and their ownership percentage in iOLO Capital Inc.

1 Request No. 127.

2 All documents evidencing or regarding real property agreements, including but not limited
3 to all office lease agreements for Sydnee Properties, LLC, in effect during the period
4 January 1, 2023, through the date of production; tenant leases and rental agreements in
5 effect from January 1, 2023, through the date of production for the property located at 7702
6 Spring Hill St., in Chino, California 91708.

7
8 Request No. 128.

9 All Schedules K-1 issued to Sydnee Properties, LLC, for the years 2022 through 2024,
10 including but not limited to Origin Opportunity Zone Fund LLC, excepting the 2022 and
11 2023 Schedules K-1 from Avistone Industrial Property Fund II, LLC.

12 Request No. 129.

13 All documents evidencing or regarding any contributions made by Sydnee Properties, LLC,
14 from investments, including but not limited to Avistone Dearborn, LLC, and Origin
15 Opportunity Zone Fund LLC for the period January 1, 2024, through current.

16
17 Request No. 130.

18 All documents evidencing or regarding any distributions received by Sydnee Properties,
19 LLC, from investments, including but not limited to Avistone Dearborn, LLC, and Origin
20 Opportunity Zone Fund LLC for the period January 1, 2024, through current.

21
22 Request No. 131.

23 All documents that regard or evidence a tracing of the sales proceeds from 1405 Pioneer
24 Street, #H, in Brea, California.

1 Request No. 132.

2 Access to for inspection of paid bill files and invoices for the periods January 1, 2021,
3 through the date of production.

4

5

THE LAW OFFICE OF LAUREN MULLEE

6

Lauren Mullee

7 Dated: 09/04/2025

By: _____

8

Lauren Mullee, Attorney for Petitioner,
Helen Su Irving-Yan

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Lauren Mullee 253665 — The Law Office of Lauren Mullee, A Professional Law Corporation One Park Plaza, Suite 600 Irvine CA 92614 TELEPHONE NO.: 949-570-0701 FAX NO. (Optional): 949-570-0704 E-MAIL ADDRESS (Optional): lauren@laurenmulleelaw.com ATTORNEY FOR (Name): Helen Su Irving-Yan	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 341 The City Drive South MAILING ADDRESS: Same CITY AND ZIP CODE: Orange 92868-3205 BRANCH NAME: Lamoreaux Justice Center	
PETITIONER/PLAINTIFF: Helen Su Irving-Yan RESPONDENT/DEFENDANT: Kelvin Yan OTHER PARENT/PARTY:	CASE NUMBER: 21D003196 (If applicable, provide): HEARING DATE: HEARING TIME: DEPT.:
PROOF OF SERVICE BY MAIL	

NOTICE: To serve temporary restraining orders you must use personal service (see form FL-330).

1. I am at least 18 years of age, not a party to this action, and I am a resident of or employed in the county where the mailing took place.
2. My residence or business address is:
 One Park Plaza, Suite 600
 Irvine, CA 92614
3. I served a copy of the following documents (specify):
 Petitioner's Form Interrogatories, Family Law, Set 2; Petitioner's Special Interrogatories, Set 2; Petitioner's Declaration for Additional Special Interrogatories, Set 2; Petitioner's Request for Production of Documents, Set 3.

by enclosing them in an envelope AND

- a. **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid.
- b. **placing** the envelope for collection and mailing on the date and at the place shown in item 4 following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelope was addressed and mailed as follows:
 - a. Name of person served: Kelvin Yan
 - b. Address: 2984 E. Stearns Street, Brea, CA 92821
 - c. Date mailed: 9/4/25
 - d. Place of mailing (city and state): La Palma, California

5. I served a request to modify a child custody, visitation, or child support judgment or permanent order which included an address verification declaration. (Declaration Regarding Address Verification—Postjudgment Request to Modify a Child Custody, Visitation, or Child Support Order (form FL-334) may be used for this purpose.)

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

Date: 9/4/25

Katy M. Flores _____

(TYPE OR PRINT NAME)

▶ *Katy M. Flores*

(SIGNATURE OF PERSON COMPLETING THIS FORM)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 253665 NAME: Lauren Mullee FIRM NAME: The Law Office of Lauren Mullee, A Professional Law Corporation STREET ADDRESS: One Park Plaza, Suite 600 CITY: Irvine STATE: CA ZIP CODE: 92614 TELEPHONE NO.: 949-570-0701 FAX NO.: 949-570-0704 E-MAIL ADDRESS: lauren@laurenmulleelaw.com ATTORNEY FOR (name): Helen Su Irving-Yan	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 341 The City Drive South MAILING ADDRESS: Same CITY AND ZIP CODE: Orange 92868-3205 BRANCH NAME: Lamoreaux Justice Center	CASE NUMBER: 21D003196
PLAINTIFF/PETITIONER: Helen Su Irving-Yan DEFENDANT/RESPONDENT: Kelvin Yan	JUDICIAL OFFICER: Israel Claustro
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: C22

1. I am at least 18 years old.
 - a. My residence or business address is (specify):
 One Park Plaza, Suite 600
 Irvine, CA 92614
 - b. My electronic service address is (specify):
 katy@laurenmulleelaw.com
2. I electronically served the following documents (exact titles):
 Petitioner's Form Interrogatories, Family Law, Set 2; Petitioner's Special Interrogatories, Set 2; Petitioner's Declaration for Additional Special Interrogatories, Set 2; Petitioner's Request for Production of Documents, Set 3.

The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:
 - a. Name of person served: **Kelvin Yan**
 On behalf of (name or names of parties represented, if person served is an attorney):
Kelvin Yan, In Pro Per
 - b. Electronic service address of person served :
kyan@kanex.com
 - c. On (date): **9/4/25**

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: **9/4/25**

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

Katy M. Flores

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)