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6 Attorney for Petitioner, Helen Su Irving-Yan

7
8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE**
10 **LAMOREAUX JUSTICE CENTER**

11 HELEN SU IRVING-YAN,

12 Petitioner,

13 and

14 KELVIN YAN,

15 Respondent.

CASE NO.: 21D003196

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

PETITIONER'S SPECIAL
INTERROGATORIES, SET NO. 2

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20 **DEMANDING PARTY:** Petitioner, HELEN SU IRVING-YAN

21 **RESPONDING PARTY:** Respondent, KELVIN YAN

22 **SET NO.:** TWO (2)

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

24 YOU ARE HEREBY REQUESTED TO answer under oath separately and full,
25 pursuant to Code of Civil Procedure Section 2040.01 et seq., the following interrogatories:
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28

SPECIAL INTERROGATORIES, SET TWO (2)

KANEX AND KANEX PRO, INC.

Special Interrogatory No. 1.

List all intellectual property, including patents, trademarks, and copyrights held by Kanex as of December 31, 2022, through the date of production.

Special Interrogatory No. 2.

State the name, age, address, and relationship to you each person or entity with knowledge regarding all intellectual property, including patents, trademarks, and copyrights held by Kanex as of December 31, 2022, through the date of production.

Special Interrogatory No. 3.

List all documents that evidence or regard all intellectual property, including patents, trademarks, and copyrights held by Kanex as of December 31, 2022, through the date of production.

Special Interrogatory No. 4.

List all intellectual property, including patents, trademarks, and copyrights held by Kanex Pro, Inc. as of December 31, 2022, through the date of production.

Special Interrogatory No. 5.

State the name, age, address, and relationship to you each person or entity with knowledge regarding all intellectual property, including patents, trademarks, and copyrights held by Kanex Pro, Inc. as of December 31, 2022, through the date of production.

1 Special Interrogatory No. 6.

2 List all documents that evidence or regard all intellectual property, including patents,
3 trademarks, and copyrights held by Kanex Pro, Inc. as of December 31, 2022, through the
4 date of this response.

5
6 Special Interrogatory No. 7.

7 Provide a detailed inventory listing for Kanex, including fair market values, as of December
8 31, 2024, and as of the date of this response.

9
10 Special Interrogatory No. 8.

11 List all documents that evidence or regard a detailed inventory listing for Kanex, including
12 fair market values, as of December 31, 2024, and as of the date of this response

13
14 Special Interrogatory No. 9.

15 State the name, age, address, and relationship to you each person or entity with knowledge
16 regarding a detailed inventory listing for Kanex, including fair market values, as of
17 December 31, 2024, and as of the date of this response

18
19 Special Interrogatory No. 10.

20 Provide a detailed inventory listing for Kanex Pro, Inc., including fair market values, as of
21 December 31, 2024, and as of the date of this response.

22
23 Special Interrogatory No. 11.

24 List all documents that evidence or regard a detailed inventory listing for Kanex Pro, Inc.,
25 including fair market values, as of December 31, 2024, and as of the date of this response.
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1 Special Interrogatory No. 12.

2 State the name, age, address, and relationship to you each person or entity with knowledge
3 regarding a detailed inventory listing for Kanex Pro, Inc., including fair market values, as of
4 December 31, 2024, and as of the date of this response.

5
6 Special Interrogatory No. 13.

7 Provide a detail of fixed assets for Kanex, including but not limited to a description of each
8 asset, original cost of the asset and the date the asset was purchased. For automobiles
9 and other vehicles, please include the year, make, and model and whether the vehicle is for
10 personal or business use, or both, with estimated allocation.

11 Special Interrogatory No. 14.

12 List all documents that evidence or regard any detail of fixed assets for Kanex, including
13 but not limited to a description of each asset, original cost of the asset and the date the
14 asset was purchased. For automobiles and other vehicles, please include the year, make,
15 and model and whether the vehicle is for personal or business use, or both, with estimated
16 allocation.

17
18 Special Interrogatory No. 15.

19 State the name, age, address, and relationship to you each person or entity with knowledge
20 regarding any detail of fixed assets for Kanex, including but not limited to a description of
21 each asset, original cost of the asset and the date the asset was purchased. For
22 automobiles and other vehicles, please include the year, make, and model and whether the
23 vehicle is for personal or business use, or both, with estimated allocation.

24
25 Special Interrogatory No. 16.

26 Provide a detail of fixed assets for Kanex Pro, Inc., including but not limited to a description
27 of each asset, original cost of the asset and the date the asset was purchased. For
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1 automobiles and other vehicles, please include the year, make, and model and whether the
2 vehicle is for personal or business use, or both, with estimated allocation.

3
4 Special Interrogatory No. 17.

5 List all documents that evidence or regard any detail of fixed assets for Kanex, including
6 but not limited to a description of each asset, original cost of the asset and the date the
7 asset was purchased. For automobiles and other vehicles, please include the year, make,
8 and model and whether the vehicle is for personal or business use, or both, with estimated
9 allocation.

10 Special Interrogatory No. 18.

11 State the name, age, address, and relationship to you each person or entity with knowledge
12 regarding any detail of fixed assets for Kanex Pro, Inc., including but not limited to a
13 description of each asset, original cost of the asset and the date the asset was purchased.
14 For automobiles and other vehicles, please include the year, make, and model and whether
15 the vehicle is for personal or business use, or both, with estimated allocation.

16
17 Special Interrogatory No. 19.

18 List all personal expenses paid through Kanex for the benefit of either Kelvin Yan or Helen
19 Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1, 2025, through
20 the date of production, including but not limited to expense descriptions and amounts by
21 entity that paid the expenses. For those expenses that are a mixture of personal and
22 business, *i.e.*, automobile expenses, meals, entertainment, or cellular telephone, provide
23 an estimated percentage of business and personal expenses, and an explanation of how
24 the estimates were determined.

25 Special Interrogatory No. 20.

26 State the name, age, address, and relationship to you each person or entity with knowledge
27 regarding all personal expenses paid through Kanex for the benefit of either Kelvin Yan or
28

1 Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1, 2025,
2 through the date of production.

3
4 Special Interrogatory No. 21.

5 List all documents that evidence or regard all personal expenses paid through Kanex for
6 the benefit of either Kelvin Yan or Helen Irving-Yan, or both, by year, for the years 2021
7 through 2024, and January 1, 2025, through the date of production.

8
9 Special Interrogatory No. 22.

10 List all personal expenses paid through Kanex Pro, Inc. for the benefit of either Kelvin Yan
11 or Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1,
12 2025, through the date of production, including but not limited to expense descriptions and
13 amounts by entity that paid the expenses. For those expenses that are a mixture of
14 personal and business, *i.e.*, automobile expenses, meals, entertainment, or cellular
15 telephone, provide an estimated percentage of business and personal expenses, and an
16 explanation of how the estimates were determined.

17 Special Interrogatory No. 23.

18 State the name, age, address, and relationship to you each person or entity with knowledge
19 regarding all personal expenses paid through Kanex Pro, Inc. for the benefit of either Kelvin
20 Yan or Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1,
21 2025, through the date of production.

22
23 Special Interrogatory No. 24.

24 List all documents that evidence or regard all personal expenses paid through Kanex Pro,
25 Inc. for the benefit of either Kelvin Yan or Helen Irving-Yan, or both, by year, for the years
26 2021 through 2024, and January 1, 2025, through the date of production.

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1 Special Interrogatory No. 25.

2 List all personal expenses paid through Kanex for the benefit of either Kelvin Yan or Helen
3 Irving-Yan, or both, by year, for the years 2021 through 2024, and January 1, 2025, through
4 the date of production, including but not limited to expense descriptions and amounts by
5 entity that paid the expenses. For those expenses that are a mixture of personal and
6 business, *i.e.*, automobile expenses, meals, entertainment, or cellular telephone, provide
7 an estimated percentage of business and personal expenses, and an explanation of how
8 the estimates were determined.

9
10 Special Interrogatory No. 26.

11 Identify by name, age, address, and relationship to you each person or entity with
12 knowledge regarding all personal expenses paid through Kanex for the benefit of either
13 Kelvin Yan or Helen Irving-Yan, or both, by year, for the years 2021 through 2024, and
14 January 1, 2025, through the date of production.

15 Special Interrogatory No. 27.

16 List all documents that evidence or regard all personal expenses paid through Kanex for
17 the benefit of either Kelvin Yan or Helen Irving-Yan, or both, by year, for the years 2021
18 through 2024, and January 1, 2025, through the date of production.

19
20 Special Interrogatory No. 28.

21 List all documents that evidence or regard all personal expenses paid through Kanex for
22 the benefit of either Kelvin Yan or Helen Irving-Yan, or both, by year, for the years 2021
23 through 2024, and January 1, 2025, through the date of production.

24
25 Special Interrogatory No. 29.

26 Provide your estimate of collectability of receivables for all accounts receivable for Kanex,
27 as of December 31, 2024, and as of the date of this response for the latest month
28 completed in 2025.

1 Special Interrogatory No. 30.

2 List all documents that evidence or regard the collectability of receivables for Kanex, as of
3 December 31, 2024, and as of the date of this response for the latest month completed in
4 2025.

5
6 Special Interrogatory No. 31.

7 Identify by name, age, address, and relationship to you the person(s) or entity(ies) with
8 knowledge regarding the collectability of receivables for Kanex, as of December 31, 2024,
9 and as of the date of this response for the latest month completed in 2025.

10 Special Interrogatory No. 32.

11 Provide your estimate of collectability of receivables for all accounts receivable for Kanex
12 Pro, Inc., as of December 31, 2024, and as of the date of this response for the latest month
13 completed in 2025.

14
15 Special Interrogatory No. 33.

16 List all documents that evidence or regard the collectability of receivables for Kanex Pro,
17 Inc., as of December 31, 2024, and as of the date of this response for the latest month
18 completed in 2025.

19
20 Special Interrogatory No. 34.

21 Identify by name, age, address, and relationship to you the person(s) or entity(ies) with
22 knowledge regarding the collectability of receivables for Kanex Pro, Inc., as of December
23 31, 2024, , and as of the date of this response for the latest month completed in 2025.

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LOAD KARMA, INC.

Special Interrogatory No. 35.

Provide your estimate of collectability of receivables for all accounts receivable for Load Karma, Inc., as of December 31, 2022, December 31, 2024, and as of the date of this response.

Special Interrogatory No. 36.

List all documents that evidence or regard the collectability of receivables for Load Karma, Inc., as of December 31, 2022, December 31, 2024, and as of the date of this response.

Special Interrogatory No. 37.

Identify by name, age, address, and relationship to you the person(s) or entity(ies) with knowledge regarding the collectability of receivables for Load Karma, Inc., as of December 31, 2022, December 31, 2024, and as of the date of this response.

Special Interrogatory No. 38.

Detailed inventory listing for Load Karma, Inc., including fair market values, as of December 31, 2022, December 31, 2023, December 31, 2024, and as of the date of this response (latest month completed in 2025).

Special Interrogatory No. 39.

List all documents that evidence or regard any detailed inventory listing for Load Karma, Inc., including fair market values, as of December 31, 2022, December 31, 2023, December 31, 2024, and as of the date of this response (latest month completed in 2025).

Special Interrogatory No. 40.

Identify by name, age, address, and relationship to you the person(s) or entity(ies) with knowledge regarding any detailed inventory listing for Load Karma, Inc., including fair

1 market values, as of December 31, 2022, December 31, 2023, December 31, 2024, and as
2 of the date of this response (latest month completed in 2025).

3
4 Special Interrogatory No. 41.

5 For each vehicle owned or leased by Load Karma, Inc., identify it by year, make, and
6 model, and whether and to what extent the particular vehicle(s) is or was for personal or
7 business use.

8
9 Special Interrogatory No. 42.

10 Identify by name, age, address, and relationship to you the person(s) or entity(ies) with
11 knowledge regarding whether and to what extent any vehicle owned or leased by Load
12 Karma, Inc. is or was for personal or business use.

13
14 Special Interrogatory No. 43.

15 Identify all documents that evidence or regard whether and to what extent any vehicle
16 owned or leased by Load Karma, Inc. is or was for personal or business use.

17 BUSINESSES - GENERAL

18
19 Special Interrogatory No. 44.

20 List all personal expenses paid through any business entity for the benefit of Kevin Yan or
21 Helen Su Irving-Yan, or both, for the years 2021 through 2024, and January 1, 2025,
22 through the date of production.

23
24 Special Interrogatory No. 45.

25 For all personal expenses paid through any business entity for the benefit of Kevin Yan or
26 Helen Su Irving-Yan, or both, for the years 2021 through 2024, and January 1, 2025,
27 through the date of production that are a mixture of personal and business use (*i.e.*,

1 automobile expense, meals and entertainment, or cellular phone), estimate the percentage
2 of business and personal expense use and explain how the estimates were determined.

3
4 Special Interrogatory No. 46.

5 Identify by name, age, address, and relationship to you the person(s) or entity(ies) with
6 knowledge regarding all personal expenses paid through any business entity for the benefit
7 of Kelvin Yan or Helen Su Irving-Yan, or both, for the years 2021 through 2024, and
8 January 1, 2025, through the date of production.

9
10 Special Interrogatory No. 47.

11 Identify all documents that evidence or regard all personal expenses paid through any
12 business entity for the benefit of Kelvin Yan or Helen Su Irving-Yan, or both, for the years
13 2021 through 2024, and January 1, 2025, through the date of production.

14
15 Special Interrogatory No. 48.

16 Trace completely the sales proceeds from 1405 Pioneer Street, #H.

17
18 Special Interrogatory No. 49.

19 Identify all documents that evidence or regard a complete tracing of the sales proceeds
20 from 1405 Pioneer Street, #H, in Brea, California.

21 **THE LAW OFFICE OF LAUREN MULLEE**

22
23 Dated: 09/04/2025

24 *Lauren Mullee*
25 By: _____
26 Lauren Mullee, Attorney for Respondent,
27 Helen Su Irving-Yan
28

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 CASE NUMBER: 21D003196 (If applicable, provide): HEARING DATE: HEARING TIME: DEPT.:
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:	
PROOF OF SERVICE BY MAIL	

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

- 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.
- My residence or business address is:
One Park Plaza, Suite 600
Irvine, CA 92614
- 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

- depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid.
- 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.

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

- 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)

(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@laurenmulleeelaw.com ATTORNEY FOR (name): Helen Su Irving-Yan	FOR COURT USE ONLY CASE NUMBER: 21D003196 JUDICIAL OFFICER: Israel Claustro DEPARTMENT: C22
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	
PLAINTIFF/PETITIONER: Helen Su Irving-Yan DEFENDANT/RESPONDENT: Kelvin Yan	
PROOF OF ELECTRONIC SERVICE	

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@laurenmulleeelaw.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)