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THE LAW OFFICE OF LAUREN MULLEE  
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Irvine, California 92614  
3 Tel.: 949-570-0701; Fax: 949-570-0701  
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5 Attorney for Petitioner, Helen Su Irving-Yan  
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7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 FOR THE COUNTY OF ORANGE  
9 LAMOREAUX JUSTICE CENTER  
10

11 HELEN SU IRVING-YAN,

12 Petitioner,

13 v.

14 KELVIN YAN,

15 Respondent.  
16  
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Case No. 21D003196

**DECLARATION FOR ADDITIONAL  
DISCOVERY RE PETITIONER,  
HELEN SU IRVING-YAN'S  
SPECIAL INTERROGATORIES,  
SET 2**

18 I, Lauren Mullee, declare as follows:

19 1. I am an attorney at law duly licensed to practice law before the State of California,  
20 and I am the owner and managing attorney of The Law Office of Lauren Mullee, attorneys  
21 of record for Petitioner, HELEN SU IRVING-YAN in this litigation. If called to testify, I could  
22 competently testify with personal knowledge to the following.

23 2. This set of interrogatories will cause the total number of specially prepared  
24 interrogatories propounded to the parties to whom they are directed to exceed the number  
25 of specially prepared interrogatories permitted by section 2030.030 of the Code of Civil  
26 Procedure.

27 3. Other than form interrogatories, my office has previously propounded a total of  
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1 112 special interrogatories to this party.

2 4. This set of interrogatories contains a total of 49 specially prepared interrogatories.  
3 Thus, the total number of special interrogatories propounded to date is 161.

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

6 6. I have personally examined each of the questions in this set of interrogatories.

7 7. This number of questions is warranted under section 2030.040 of the Code of  
8 Civil Procedure because of (a) the complexity or quantity of the existing and potential  
9 issues in the particular case, (b) the financial burden on the party entailed in conducting the  
10 discovery by oral deposition, (c) the expedience of using this method of discovery to  
11 provide the responding party the opportunity to conduct and inquiry, investigation, or  
12 search of files or records to supply the information sought.

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

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

18 Dated: 09/04/2025

**THE LAW OFFICE OF LAUREN MULLEE**

*Lauren Mullee*

By: \_\_\_\_\_  
Lauren Mullee, CFLS  
Attorney for Petitioner, Helen Su Irving-Yan

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Lauren Mullee 253665</b> — 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
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange</b> 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: <b>21D003196</b>  <i>(If applicable, provide):</i> HEARING DATE:  HEARING TIME:  DEPT.:
<b>PROOF OF SERVICE BY MAIL</b>	

**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

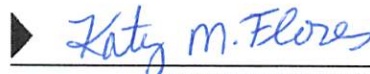
5.  I served a request to modify a child custody, visitation, or child support judgment or permanent order which included an address verification declaration. (*Declaration Regarding Address Verification—Postjudgment Request to Modify a Child Custody, Visitation, or Child Support Order* (form FL-334)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



(SIGNATURE OF PERSON COMPLETING THIS FORM)

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

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)