

# **EXHIBIT A**

Sub No 137

THE HONORABLE CATHERINE MOORE  
Department 44

Noted for Hearing: Tuesday, September 28, 2021  
Without Oral Argument

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,

Plaintiffs,

v.

GEMINI RIDGEGATE FEE OWNER, LLC, a  
Foreign limited liability company, AVENUES  
RESIDENTIAL LLC, a Foreign limited liability  
company, and I.Q. DATA INTERNATIONAL,  
INC., a Washington for profit corporation,

Defendants.

NO. 20-2-07084-0 SEA

~~PROPOSED~~ ORDER DENYING  
DEFENDANT I.Q. DATA INTERNATIONAL,  
INC.'S MOTION FOR PROTECTIVE ORDER

ORIGINAL  
COPY

THIS MATTER came before the Court on Defendant I.Q. Data International, Inc.'s Motion for Protective Order. Prior to ruling the Court considered the following:

1. Defendant I.Q. Data International, Inc.'s Motion for Protective Order;
2. Declaration of Christopher E. Hawk in Support of Defendant I.Q. Data International, Inc.'s Motion for Protective Order;
3. Plaintiffs' Response to Defendant I.Q. Data International, Inc.'s Motion for Protective Order;
4. Declaration of Blythe H. Chandler in opposition to Defendant I.Q. Data International, Inc.'s Motion for Protective Order.;

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5. Defendant's Reply, if any;  
6. \_\_\_\_\_; and  
7. \_\_\_\_\_

Based on the foregoing, IT IS HEREBY ORDERED THAT Defendant I.Q. Data International, Inc.'s Motion for Protective Order is DENIED. *without prejudice.*  
I.Q. Data's ~~conduct in filing the motion for protective order~~ *current* ~~was not substantially~~ *abundant, general, lacks merit.\**  
~~justified.~~ Plaintiffs are awarded their reasonable attorneys' fees and costs incurred in responding to I.Q. Data's motion for protective order ~~and motion to shorten time for hearing the motion for protective order under CR 37(a)(4).~~ Plaintiffs shall file a declaration documenting their reasonable attorneys' fees and costs within 10 days of the date of this order.

IT IS SO ORDERED.

DATED this 5th day of October, 2021.

  
THE HONORABLE CATHERINE MOORE

Presented by:  
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*\*Undue burden has not been established. Good faith efforts to confer has not been established.*

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*Attorneys for Plaintiffs*

# Sub No 138

THE HONORABLE CATHERINE MOORE  
Department 44  
Noted for Consideration: September 28, 2021  
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,  
Plaintiffs,

v.

GEMINI RIDGEGATE FEE OWNER, LLC, a  
Foreign limited liability company, AVENUE5  
RESIDENTIAL LLC, a Foreign limited liability  
company, and IQ DATA INTERNATIONAL, INC.,  
a Washington for profit corporation,  
Defendants.

NO. 20-2-07084-0 SEA

~~PROPOSED~~ ORDER GRANTING  
PLAINTIFFS' MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND  
TESTIMONY FROM DEFENDANT I.Q.  
DATA INTERNATIONAL, INC.

ORIGINAL  
COPY

THIS MATTER came before the Court on Plaintiffs' Motion to Compel Production of Documents and Testimony from Defendant I.Q. Data International, Inc. Prior to ruling the Court considered the following:

1. Plaintiffs' Motion to Compel Production of Documents and Testimony from Defendant I.Q. Data International, Inc;
2. Declaration of Blythe H. Chandler in Support of Plaintiffs' Motion to Compel Production of Documents and Testimony from Defendant I.Q. Data International, Inc.;
3. Defendant's Response;
4. Plaintiffs' Reply;

~~PROPOSED~~ ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND TESTIMONY FROM DEFENDANT  
I.Q. DATA INTERNATIONAL, INC. - 1  
CASE NO. 20-2-07084-0 SEA

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1 5. \_\_\_\_\_; and

2 6. \_\_\_\_\_

3 Based on the foregoing, IT IS HEREBY ORDERED THAT Plaintiffs' Motion to Compel  
4 Production of Documents and Testimony from Defendant I.Q. Data International, Inc. is  
5 GRANTED as follows:

6 1. I.Q. Data's objections to Plaintiffs' Request for Production Nos. 19, 21, 22, 24, 25,  
7 28, 29, and 32 and to Interrogatory No. 21 are OVERRULED. I.Q. Data shall produce all  
8 documents and information responsive to those requests.

9 2. I.Q. Data's Rule 30(b)(6) designee was not properly prepared to testify regarding  
10 Topic Nos. 4 and 11 of Plaintiffs' notice. I.Q. Data shall produce a witness or witnesses fully  
11 prepared to testify on those topics within 10-days of the date of this order. I.Q. Data shall pay all  
12 court reporting and attorneys' fees incurred by Plaintiffs in taking the second deposition.  
13 Plaintiffs shall file a declaration documenting their reasonable attorneys' fees and costs within  
14 10 days of the date of the deposition.

15 3. I.Q. Data's counsel's instructions not to answer questions on the basis of  
16 relevance or the permissible scope of discovery are improper. CR 30(h)(3). Counsel for I.Q. Data  
17 is prohibited from making instructions not to answer <sup>on such basis</sup> ~~or any basis other than privilege~~ in all  
18 future depositions in this case.

19 4. I.Q. Data's opposition to Plaintiffs' motion to compel was not substantially  
20 justified. Plaintiffs are awarded their reasonable attorneys' fees and costs incurred in bringing  
21 their motion to compel under CR 37(a)(4). Plaintiffs shall file a declaration documenting their  
22 reasonable attorneys' fees and costs within 10 days of the date of this order.

23 IT IS SO ORDERED.

24 DATED this 5<sup>th</sup> day of October, 2021.

25   
26 THE HONORABLE CATHERINE MOORE

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26 *Attorneys for Plaintiffs*

# Sub No 189

THE HONORABLE CATHERINE MOORE

Department 44

Noted for Consideration: November 23, 2021

Oral Argument Requested

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,

Plaintiffs,

v.

GEMINI RIDGEGATE FEE OWNER, LLC, a  
Foreign limited liability company, AVENUE5  
RESIDENTIAL LLC, a Foreign limited liability  
company, and IQ DATA INTERNATIONAL, INC.,  
a Washington for profit corporation,

Defendants.

NO. 20-2-07084-0 SEA

~~PROPOSED~~ ORDER GRANTING  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION

**COPY**  
**ORIGINAL**

THIS MATTER came before the Court on Plaintiffs' motion for class certification. Prior to ruling the Court considered the following:

1. Plaintiffs' motion for class certification;
2. Declaration of Blythe H. Chandler in support of Plaintiffs' motion for class certification;
3. Declaration of Sam Leonard in support of Plaintiffs' motion for class certification;
4. Declaration of Karanbir Singh in support of Plaintiffs' motion for class certification;

- 1           5.     Declaration of Harpreet Singh in support of Plaintiffs' motion for class  
2 certification;
- 3           6.     Declaration of Nasteho Omar in support of Plaintiffs' motion for class  
4 certification;
- 5           7.     Defendant I.Q. Data International, Inc.'s Response;
- 6           8.     Plaintiffs' Reply;
- 7           9.     Supplemental Declaration of Blythe H. Chandler in support of Plaintiffs' motion  
8 for class certification;
- 9           10.    \_\_\_\_\_ ; and
- 10          11.    \_\_\_\_\_.

11           Based on the foregoing, IT IS HEREBY ORDERED THAT Plaintiffs' motion for class  
12 certification is GRANTED as follows:

13          12.    The Court finds that the CPA and FDCPA Classes satisfy the requirements of CR  
14 23(a) and (b)(3).

15          13.    The numerosity requirement is satisfied because there are at least 10,500  
16 members of the CPA Class and at least 4,862 members of the FDCPA Class. *See Miller v. Farmer*  
17 *Bros. Co.*, 115 Wn. App. 815, 821, 64 P.3d 49 (2003).

18          14.    The commonality requirement is satisfied because there are overarching  
19 questions of law and fact common to the Classes, including (1) whether IQ Data's practice of  
20 charging interest on former tenant accounts calculated from the date of move-out is a violation  
21 of the Collection Agency Act, the Consumer Protection Act, and the Fair Debt Collection  
22 Practices Act, and (2) whether IQ Data's practice of using threats of credit reporting to collect  
23 interest and other amounts was unfair or deceptive. *See Smith v. Behr Process Corp.*, 113 Wn.  
24 App. 306, 320, 54 P.3d 665 (2002).

25          15.    The typicality requirement is satisfied because Plaintiffs' claim arise from the  
26 same course of conduct that gives rise to the claims of other Class members and is based on the  
27 same legal theory. *See Pellino v. Brink's Inc.*, 164 Wn. App. 668, 684, 267 P.3d 383 (2011).

1           16.     The adequacy requirement is satisfied because Plaintiffs have no interests  
2 antagonistic to the other Class members and are represented by qualified counsel. *See Hansen*  
3 *v. Ticket Track, Inc.*, 213 F.R.D. 412, 415 (W.D. Wash. 2003).

4           17.     The predominance requirement is satisfied because there is a “common nucleus  
5 of operative facts” supporting each Class member’s claims, and all Class members were subject  
6 to the same conduct by IQ Data. *See Chavez v. Our Lady of Lourdes Hosp. at Pasco*, 190 Wn.2d  
7 507, 516, 415 P.3d 224 (2018).

8           18.     The superiority requirement is satisfied because the resolution of hundreds of  
9 claims in one action is far superior to individual lawsuits and promotes consistency and  
10 efficiency of adjudication. *See Chavez*, 190 Wn.2d at 515.

11           IT IS HEREBY ORDERED THAT Plaintiffs’ Motion for Class Certification is GRANTED. The  
12 Court certifies the following Classes:

13           **CPA Class:** All Washington residents who are former tenants of a residential  
14 property in Washington on whose account IQ Data collected, on or after January  
15 5, 2017, interest calculated from the tenant’s move out date.

16           **FDCPA Class:** All Washington residents who are former tenants of a residential  
17 property in Washington on whose account IQ Data collected or attempted to  
18 collect, on or after January 5, 2020, interest calculated from the tenant’s move out  
19 date.

20           Plaintiffs Karanbir Singh, Harpreet Singh are appointed to serve as class representatives  
21 of the CPA Class and Plaintiff Nasteho Omar is appointed to serve as class representative for the  
22 FDCPA Class, and their counsel Terrell Marshall Law Group and Leonard Law are appointed to  
23 serve as counsel for the Classes.

24           The parties shall confer regarding a proposed notice plan. Class Counsel shall submit  
25 either an agreed notice plan or motion to approve notice within 20 days of the date of this  
26 order.  
27

1 IT IS SO ORDERED.

2 DATED this 23<sup>rd</sup> day of November, 2021.

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4 \_\_\_\_\_  
THE HONORABLE CATHERINE MOORE

5 Presented by:

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# Sub No 371

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER GRANTING PLAINTIFFS' MOTION  
TO COMPEL RESPONSE TO REQUEST  
FOR PRODUCTION NO. 35**

THIS MATTER came before the Court on Plaintiffs' Motion to Compel Response to Request for Production No. 35. Prior to ruling, the Court considered the following documents and evidence:

1. Plaintiffs' Motion to Compel Response to Request for Production No. 35;
2. Declaration of Blythe H. Chandler in Support of Plaintiffs' Motion to Compel Response to Request for Production No. 35;
3. Defendant's Response;
4. Plaintiffs' Reply;

Based on the foregoing, and being fully advised, it is HEREBY ORDERED that Plaintiffs' Motion to Compel Response to Request for Production No. 35 is GRANTED. Defendant has acknowledged the relevance of these items, and has not shown any basis to conclude that these items are overly burdensome to produce. The requests are appropriate, Plaintiff had to demand

1 these items repeatedly, and Defendants had no appropriate basis to continue to deny and delay  
2 these requests. Defendants are to produce the requested items within 10 days of the entry of  
3 this order.

4 The Court further finds that it is appropriate to award sanctions for the Plaintiff's efforts  
5 in researching and preparing and noting this motion. Thus, Plaintiffs are awarded reasonable  
6 attorneys' fees incurred by class counsel in drafting this motion and reply. A declaration and  
7 proposed order to support award of fees shall be submitted to this court within 5 days of the  
8 entry of this order.

9 IT IS SO ORDERED. Signed this 17<sup>th</sup> of February, 2022.

10   
11 \_\_\_\_\_  
12 THE HONORABLE ANDREA K. ROBERTSON

Sub No 373

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
Without Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER GRANTING PLAINTIFFS'  
RESPONSE TO IQ DATA'S MOTION TO  
COMPEL PLAINTIFF COUNSEL'S  
COMPLIANCE WITH CR 30(H), TO  
COMPEL PLAINTIFF'S TESTIMONY, AND  
FOR SANCTIONS FOR DEPOSITION  
MISCONDUCT**

THIS MATTER came before the Court on Plaintiffs' Response to IQ Data's Motion to Compel Plaintiff Counsel's Compliance with CR 30(H), to Compel Plaintiff's Testimony, and for Sanctions for Deposition Misconduct. Prior to ruling, the Court considered the following documents and evidence:

1. Defendant's IQ Data's Motion to Compel Plaintiff Counsel's Compliance with CR 30(H), to Compel Plaintiff's Testimony, and for Sanctions for Deposition Misconduct;
2. Declaration of Sean P. Flynn in Support of Defendant's IQ Data's Motion to Compel Plaintiff Counsel's Compliance with CR 30(H), to Compel Plaintiff's Testimony, and for Sanctions for Deposition Misconduct;
3. Plaintiffs' Response to IQ Data's Motion to Compel Plaintiff Counsel's Compliance with CR 30(H), to Compel Plaintiff's Testimony, and for Sanctions for Deposition Misconduct;
4. Declaration of Beth E. Terrell in Support of Response;

ORDER GRANTING PLAINTIFFS' RESPONSE TO IQ DATA'S  
MOTION TO COMPEL PLAINTIFF COUNSEL'S COMPLIANCE  
WITH CR 30(H), TO COMPEL PLAINTIFF'S TESTIMONY, AND FOR  
SANCTIONS FOR DEPOSITION MISCONDUCT – 1

CASE NO. 20-2-07084-0 SEA

JUDGE ANDREA K. ROBERTSON  
KING COUNTY SUPERIOR COURT



# Sub No 374

HONORAELE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER GRANTING PLAINTIFFS' MOTION  
TO QUASH SUBPCENAS FOR PLAINTIFF  
EMPLOYMENT RECORDS AND FOR  
PROTECTIVE ORDER**

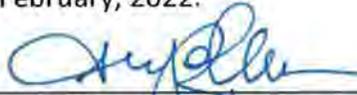
THIS MATTER came before the Court on Plaintiffs' Motion to Quash Subpoenas for plaintiffs' employment records and for Protective Order. Prior to ruling, the Court considered the following documents and evidence:

1. Plaintiffs' Motion to Quash Subpoenas and for Protective Order;
2. Declaration of Blythe H. Chandler in Support of Plaintiffs' Motion to Quash Subpoenas and for Protective Order;
3. Defendant's Response;
4. Plaintiffs' Reply;

1 Based on the foregoing, and being fully advised, this Court must now balance the need for  
2 discovery and the fundamental right to privacy. The Court finds that Defendant's subpoena is  
3 overly broad, includes private records, and cannot be justified per CR 26 and applicable case law.  
4 Defendant seeks no limitation on the discovery sought from current and former employers of  
5 the plaintiffs, and cannot explain how *entire* employment files would be needed to show  
6 "economic damages" or "ulterior motives" or otherwise generally "discredit" the plaintiffs.  
7

8 It is HEREBY ORDERED that Plaintiffs' Motion to Quash Subpoenas (for Plaintiff Employment  
9 Records) and for Protective Order IS GRANTED.

10 IT IS SO ORDERED. Signed this 17<sup>th</sup> of February, 2022.

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12 \_\_\_\_\_  
13 THE HONORABLE ANDREA K. ROBERTSON

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
Without Oral Argument

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,  
  
Plaintiffs,  
  
v.  
  
IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,  
  
Defendant.

NO. 20-2-07084-0 SEA

**ORDER GRANTING IN PART AND  
DENYING IN PART DEFENDANT IQ  
DATA INTERNATIONAL, INC.'S MOTION  
FOR PROTECTIVE ORDER AGAINST  
EMPLOYEE DEPOSITIONS**

THIS MATTER, having come before the Court on Defendant IQ Data International, Inc.'s  
Emergency Motion For Protective Order Against Employee Depositions, and the Court having  
reviewed the records and files herein, and specifically:

1. Defendant IQ Data International, Inc.'s Emergency Motion for Protective Order Against Employee Depositions;
2. Declaration of Christopher E. Hawk in Support of Defendant IQ Data International, Inc.'s Emergency Motion for Protective Order Against Employee Depositions, and the Exhibits thereto;
3. Plaintiffs' Response to Defendant IQ Data International, Inc.'s Emergency Motion for Protective Order Against Employee Depositions;
4. Declaration of Blythe H. Chandler in Support of Plaintiffs' Response to Defendant IQ Data International, Inc.'s Motion for Protective Order, and the Exhibits thereto, if any;

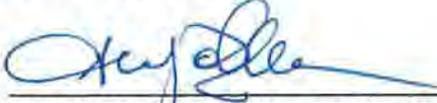
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- 5. Defendant IQ Data International, Inc.'s Reply on Its Emergency Motion for Protective Order Against Employee Depositions;
- 6. Declaration of Christopher E. Hawk in Support of Defendant IQ Data International, Inc.'s Reply on Its Emergency Motion for Protective Order Against Employee Depositions, if any;
- 7. \_\_\_\_\_

The Court being fully advised, IT IS HEREBY ORDERED that Defendant IQ Data International, Inc.'s Emergency Motion For Protective Order Against Employee Depositions is GRANTED IN PART; and DENIED IN PART:

- Plaintiffs are FORECLOSED from deposing Lance Martin and Karen Denyse.
- Motion to prohibit depositions of Samantha Forhning-Hammer, Patrick Madden, Makayla Bozeman, and Michelle Hopkinson is HEREBY DENIED.

IT IS SO ORDERED. Signed this 17<sup>th</sup> of February, 2022.

  
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THE HONORABLE ANDREA K. ROBERTSON

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
With Oral Argument

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR,  
Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,  
Defendant.

NO. 20-2-07084-0 SEA

**ORDER GRANTING PLAINTIFF'S MOTION  
TO COMPEL CLASS DATA AND ENFORCE  
DISCOVERY ORDER AND FOR  
SANCTIONS**

THIS MATTER came before the Court on Plaintiffs' Motion to Enforce Discovery Order and for Sanctions. Prior to ruling, the Court considered the following documents and evidence:

1. Plaintiffs' Motion to Compel Class Data and Enforce Discovery Order and for Sanctions;
2. Declaration of Sam Leonard in Support of Plaintiffs' Motion to Enforce Discovery Order and for Sanctions;
3. Defendant's Response, if any;
4. Plaintiffs' Reply; and
5. Oral Arguments.

1 Based on the foregoing, and being fully advised, it is HEREBY ORDERED that Plaintiffs'  
2 Plaintiffs' Motion to Enforce Discovery Order and for Sanctions is GRANTED.

3 IQ Data's objections to Request for Production No. 20 are overruled. IQ Data shall  
4 provide a complete class list that meets the parameters set out by Class Counsel within ~~five (5)~~ **14**  
5 days of the date of this order.

6 IQ Data shall supplement its discovery responses as previously ordered by the Court to  
7 provide all documents and information responsive to Plaintiffs' Request for Production Nos. 19, **20**,  
8 21, 22, 24, 25, 28, 29, and **32\*** and to Interrogatory No. 21 within 5 days of the date of this order.

9 The Court finds that IQ Data's failure to comply with the Court's prior discovery order was  
10 willful. The Court finds the three-month delay in complying with a prior discovery order has  
11 prejudiced Plaintiffs' ability to prepare for depositions, dispositive motions, and trial. As a  
12 sanction under CR 37(b)(2), IQ is barred from relying upon any documents responsive to  
13 Request for Production Nos. 19, <sup>20,</sup> 21, 22, 24, 25, 28, 29, and 32 but not produced to Plaintiffs on  
14 or before January 7, 2022 in support of any of its claims, defenses, or arguments in this matter.

15 IQ Data shall pay Plaintiffs their reasonable attorneys' fees incurred in bringing this  
16 motion. Class counsel shall file a declaration documenting their reasonable attorney's fees  
17 within five (5) days of the date of this order.

18 IT IS SO ORDERED.

19 DATED this 17<sup>th</sup> day of February, 2022.

*This relates only to preparation  
of motion and reply, not the ongoing  
communications regarding discovery  
prior to this motion.*

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21   
22 THE HONORABLE ANDREA K. ROBERTSON

23 \*plaintiff to provide a  
24 definition of  
25 "complaint" to allow  
26 defendant to have  
27 clarity on scope of  
what has been produced.

# Sub No 379

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
With Oral Argument

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEHO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER DENYING DEFENDANT IQ DATA,  
INC.'S MOTION TO DISQUALIFY CLASS  
REPRESENTATIVE KARANBIR SINGH**

THIS MATTER came before the Court on Defendant IQ Data Inc.'s Motion to Disqualify Class Representative Karanbir Singh. Prior to ruling, the Court considered the following documents and evidence:

1. Defendant's Motion to Disqualify Class Representative Karanbir Singh;
2. Declaration of Petra Ambrose in Support of Defendant IQ Data's Motion to Disqualify Class Rep Singh;
3. Plaintiffs' Response to Defendants Motion to Disqualify Class Representative Karanbir Singh;
4. Declaration of Blythe H. Chandler in Support of Plaintiffs' Response to Motion to Disqualify Class Representative Karanbir Singh;



# Sub No 381

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEHO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER DENYING DEFENDANT IQ DATA,  
INC.'S MOTION TO DISQUALIFY CLASS  
REPRESENTATIVE HARPREET SINGH**

THIS MATTER came before the Court on Defendant IQ Data, Inc.'s Motion to Disqualify Class Representative Harpreet Singh. Prior to ruling, the Court considered the following documents and evidence:

1. Defendant IQ Data, Inc.'s Motion to Disqualify Class Representative Harpreet Singh;
2. Declaration of Katherine L. Saint Germain in Support of Defendant IQ Data International, Inc.'s Motion to Disqualify Class Representative Harpreet Singh;
3. Plaintiffs' Response to Defendant IQ Data, Inc.'s Motion to Disqualify Class Representative Harpreet Singh;
4. Declaration of Blythe H. Chandler in support of Plaintiffs' Response to Defendant

1 IQ Data, Inc.'s Motion to Disqualify Class Representative Harpreet Singh;

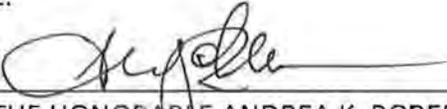
2 5. Defendant's Reply; and

3 6. Oral arguments.

4 Based on the foregoing, and being fully advised, it is HEREBY ORDERED that Defendants'  
5 Motion to Disqualify Class Representative Harpreet Singh is DENIED. Mr. Singh's claims are  
6 typical of the class, and he is more than adequate to act as a representative for the "CPA" class.  
7 Oral rulings made on the record included further specific findings on this issue.

8 IT IS SO ORDERED.

9 DATED this 17<sup>th</sup> day of February, 2022.

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11 THE HONORABLE ANDREA K. ROBERTSON

# Sub No 383

HONORABLE ANDREA K. ROBERTSON  
Department 47  
February 17, 2022  
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH, and  
NASTEHO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**ORDER DENYING DEFENDANT IQ DATA,  
INC.'S MOTION TO DISQUALIFY  
NASTEHO OMAR**

THIS MATTER came before the Court on Plaintiffs' Response to Defendant IQ Data, Inc.'s Motion to Disqualify Class Representative Nasteho Omar, the Court considered the following documents and evidence:

1. Defendant's IQ Data, Inc.'s Motion to Disqualify Class Representative Nasteho Omar;
2. Declaration of Petra Ambrose in support of IQ Data Inc.'s Motion to Disqualify Class Representative Nasteho Omar;
3. Plaintiffs' Response to Defendant IQ Data, Inc.'s Motion to Disqualify Class Representative Nasteho Omar;
4. Declaration of Blythe H. Chandler in Support of Plaintiffs' Response to Defendant

1 IQ Data, Inc.'s Motion to Disqualify Class Representative Nastehe Omar;

2 5. Defendant IQ Data, Inc's reply in support of its Motion to Disqualify Class

3 Representative Nastehe Omar;

4 6. Defendant's Reply, if any; and

5 7. Oral Arguments.

6 Based on the foregoing, and being fully advised, it is HEREBY ORDERED that Defendant's

7 IQ Data, Inc.'s Motion to Disqualify Class Representative Nastehe Omar is DENIED. Nastehe

8 Omar's claims are typical of the class, meet the statutory definition of "debts" per FDCPA, and

9 Ms. Omar is more than adequate to act as a representative for the "FDCPA" class. Oral rulings

10 made on the record included further specific findings on this issue.

11 IT IS SO ORDERED.

12 DATED this 17<sup>th</sup> day of February, 2022.

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THE HONORABLE ANDREA K. ROBERTSON

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