

From Article at GetOutOfDebt.org

EXHIBIT 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SUPERIOR COURT OF WASHINGTON FOR SPOKANE COUNTY

MICHAEL RULE, individually and on behalf of a Class of similarly situated Washington residents,

Plaintiffs,

vs.

CENTURY NEGOTIATIONS, INC., a Pennsylvania corporation; David Leuthold, and JOHN DOES 1-5,

Defendants.

NO. 10-2-03220-1

DEFENDANT CENTURY NEGOTIATIONS, INC.'S ANSWERS TO PLAINTIFFS' FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION

TO: DEFENDANT, CENTURY NEGOTIATIONS, INC.:

PRELIMINARY INSTRUCTIONS

Pursuant to Civil Rules 26, 33, and 34 of the Rules for Superior Court of the State of Washington, the above-named Plaintiffs submit the following Interrogatories and Requests for Production. These Interrogatories and Requests for Production are to be answered separately and fully under oath and signed by the person answering them within thirty (30) days from the date of service. In answering these Interrogatories and Requests for Production, you are required to

DEF. CENTURY NEGOTIATIONS' ANSWERS TO PLAINTIFFS' FIRST INTERROGATORIES AND REQUESTS

- 1 -

459584/111210_1231111210-1330/20250124

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 furnish such information as is available to you, not merely the information which
2 you know of your own personal knowledge. This is intended to include any
3 information in the possession of the agent or attorney or any investigator for the
4 answering party.

5 Court Rule requires that Defendant must respond in writing and state, with
6 respect to each item, that inspection will be permitted or that the Request is
7 objected to. If such Request is objected to, Defendant must give reason for the
8 objection. Such written responses must be made within thirty (30) days after
9 service of these Requests, and within a reasonable time following such responses,
10 Defendant must comply with these Requests by supplying Plaintiffs' attorney
11 with copies of the documents or things designated below or, in the alternative,
12 allowing Plaintiffs' attorney to inspect and copy the documents designated below
13 at the offices of The Scott Law Group, P.S., 926 West Sprague Avenue, Suite
14 680, Spokane, Washington 99201.

15 THESE INTERROGATORIES AND REQUESTS FOR PRODUCTION
16 ARE CONTINUING IN NATURE AND PLAINTIFFS DEMAND THAT ANY
17 INFORMATION COMING INTO THE POSSESSION OF DEFENDANT OR
18 ITS COUNSEL THAT WOULD CHANGE THE ANSWER OR RESPONSE IN
19 ANY WAY OR SUPPLEMENT THE MATERIAL REQUESTED BE
20 PROMPTLY FURNISHED TO PLAINTIFFS' COUNSEL NO LATER THAN
21 THIRTY (30) DAYS AFTER RECEIPT OF SUCH INFORMATION.

22
23 **DEFINITIONS, TERMS, AND INSTRUCTIONS**

24 As used in these Interrogatories and Requests for Production:

25 DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

- 2 -

459584/111210 1233114219-1229/20250124

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 1. These Interrogatories and Requests for Production are continuing in
2 nature. You have a duty to supplement your responses to these Interrogatories
3 and Requests for Production in accordance with Rule 26(e)(2) of the Rules of
4 Superior Court for the State of Washington.

5 2. Plaintiffs: "Plaintiffs" shall mean Michael Rule, individually and on
6 behalf of a Class of similarly situated Washington residents.

7 3. Person: The term "person" includes any natural person, firm,
8 association, partnership, joint venture, corporation, estate, trust, receiver, syndicate,
9 or any other group or combination acting as a unit, or other form of legal entity.

10 4. Documents: The term "document" is to be understood in its broadest
11 sense within the meaning of civil rules governing discovery. The term includes
12 recorded information of every sort, including without limitation electronic data,
13 such as emails, databases, image files, and web pages; handwritten, printed, typed,
14 drawn, sketched documents, visual images of every sort, still and video, digital
15 and recorded by any other means, and audio recordings. "Document" includes
16 every original (or an identical copy if the original is unavailable), and every copy
17 that differs in any way from the original and any translation or summary of any
18 document.

19 5. You: The term "you," and any variants thereof, shall mean the
20 Defendant, Defendant's attorneys, employees, or agents.

21 6. If any Interrogatory or Request for Production is objected to, in
22 whole or in part, set forth fully each objection and the facts on which defendant
23 relies as the basis for each such objection.
24

25
DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

459584/111210_1233111240-1229/20250124

- 3 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 DATED this 24th day of September, 2010.

2 THE SCOTT LAW GROUP, P.S.

3
4 By _____
5 DARRELL W. SCOTT, WSBA #20241
6 MATTHEW J. ZUCHETTO, WSBA #33404

7 -and-

8 TIMOTHY DURKOP, WSBA #22985
9 DURKOP LAW OFFICE

10 Attorneys for Plaintiffs
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

459584/111210 1233111210 1229/20250124

- 4 -

Belts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INTERROGATORY NO. 2: Identify the total number of Washington state residents who have contracted with Century Negotiations, Inc. for debt settlement services.

RESPONSE:

Objection to the term "debt settlement services" as vague and ambiguous, and overbroad as to time. Without waiving the objection, the total number of Washington State residents who had active contracts with the defendant during the four-year period prior to the filing of the lawsuit is approximately 1,495.

DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

459584/111210_1233114310-1229/20250124

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INTERROGATORY NO. 4: Identify the total fees paid to Century Negotiations by Washington debtors, pursuant to contracts entered into with Century Negotiations, Inc. for debt settlement services.

RESPONSE: Objection, vague and ambiguous as to the term "debt settlement services," and overbroad as to the time. Without waiving the objection, the total fees retained by CNI from Washington debtors pursuant to contracts which were active during the four year period prior to the filing of the lawsuit are approximately \$891,432. However, this number does not include amounts that were refunded to customers or paid directly to other companies.

DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

- 6 -

459584/111210 1233++1240-1229/20250124

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 7 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 8 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 9 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 10 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 11 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1311/20250124

- 12 -

Betts
Patterson
Mines
One Conventlon Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

460202/111210 1307/20250124

- 13 -

Beets
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

From Article at GetOutOfDebt.org

**DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS**

- 14 -

460202/111210 1307/20250124

Betts
Patterson
Mines
One Conventlon Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

CERTIFICATION

THE UNDERSIGNED ATTORNEY for Defendant, Century Negotiations, Inc., has read the foregoing Answers to Interrogatories and Responses to Requests for Production, and they are in compliance with CR 26(g).

DATED this 12 day of November, 2010.

BETTS, PATTERSON & MINES, P.S.

By *Steven Goldstein*
Steven Goldstein, WSBA #11042
Attorneys for Defendant Century Negotiations, Inc.

From Article at www.OfDebt.org

DEF. CENTURY NEGOTIATIONS'
ANSWERS TO PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS

460202/111210 1309/20250124

- 15 -

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988