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**Re: Dagrella v. Samsung Electronics America, Inc.
Riverside Superior Court, Case No. CVCO2405948**

Dear Ms. Cooper:

I write regarding Samsung Electronics America, Inc.'s ("Samsung") responses to Plaintiff's Form Interrogatories and Requests for Production of Documents, both served on October 11, 2024. After nearly four months and multiple extensions, Samsung has provided responses consisting entirely of boilerplate objections without any substantive information or document production.

The history of extensions in this matter is particularly concerning given the disconnect between the reasons provided for the extensions and the nature of the eventual responses. Samsung requested its first extension to December 23, 2024, stating it needed "more information from SEA to finalize the responses" because an individual with relevant knowledge would be out on PTO. A second extension was requested to January 17, 2025, and a third extension to January 31, 2025, citing the need for "more time to obtain the information necessary to serve discovery responses, particularly in light of the disruption caused by the fires." These requests clearly implied Samsung was working on gathering information for substantive responses. We accommodated each request in good faith based on these representations.

Instead, Samsung has provided nothing but boilerplate objections—responses that required no information gathering, no client input, and would not have been delayed by personnel being on PTO or fire disruptions. This suggests the stated reasons for seeking extensions were not genuine, as purely legal objections could have been served within the original timeframe.

Based on the verified allegations in the First Amended Complaint, Samsung has direct access to and should immediately produce:

1. Basic Transaction Documents:
 - a) August 11, 2024 purchase records from Samsung.com
 - b) August 14, 2024 delivery records

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- c) September 2, 2024 warranty service request records
- d) September 4, 2024 service technician records
- e) The electronic service record containing the forged signature
- f) Audio recordings/logs of the conversation with "Kingston" at the support center

2. Service Visit Documentation:

- a) Photos taken by technician during the September 4, 2024 visit
- b) Service technician's notes about internal damage found
- c) Mobile device records showing the technician's signature made in place of Plaintiff's
- d) Reports/communications between technician and Samsung about warranty denial

3. Warranty Processing Records:

- a) Internal communications about the warranty denial decision
- b) The specific warranty terms applicable to this dryer
- c) Documentation of Samsung's stated reasons for denial
- d) Records of the "Post Final Mile" voicemail referenced in our correspondence

What is particularly troubling is Samsung's business strategy at play here. The complaint meticulously details Samsung's systematic practice of denying legitimate warranty claims through a series of deflection tactics—first blaming non-existent retailers, then blaming its own installers, and ultimately resorting to forging signatures on service documents. Now, rather than simply honoring a straightforward warranty claim on a defective dryer or even providing basic discovery about the incident, Samsung has chosen to expend what must be tens of thousands of dollars in attorney fees engaging in discovery obstruction. This reveals a calculated business decision: Samsung would rather pay significant litigation costs to maintain its warranty-avoidance practices than honor its obligations to consumers.

Until now, I have deliberately kept this litigation proportional and efficient by:

- Appearing pro per with only limited assistance from retained counsel
- Granting multiple extensions of time for discovery responses
- Working cooperatively on pleading deficiencies with the original answer
- Avoiding scorched-earth litigation tactics
- Seeking practical resolution rather than maximum fees recovery

However, Samsung's systematic obstruction forces me to reevaluate this approach. If Samsung continues down this path, I will have no choice but to hand this matter off entirely to specialized consumer product defect litigation counsel. While this would actually save me considerable time and personal effort, it would expose Samsung to significantly higher statutory attorney fees under the Magnuson-Moss Warranty Act—precisely the outcome I had hoped to avoid through cooperative, efficient litigation. One must question the business wisdom of Samsung's apparent strategy of spending tens of thousands in attorney fees to obstruct discovery about a straightforward dryer warranty claim, only to face even greater exposure to statutory fees when the matter is handed to specialized counsel.

The deficient discovery responses at issue perfectly illustrate this problematic approach. Rather than simply producing readily available documents and providing basic information about the incident, Samsung has chosen to engage in wholesale discovery obstruction through boilerplate objections. This is particularly egregious given that the verified complaint provides detailed

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dates, times, and events for which Samsung indisputably has corresponding documentation. Let us examine the specific deficiencies in Samsung's responses:

Form Interrogatories:

1. ROGs 112.1-112.5: Samsung's multiple objections all fail:
 - The "premature" objection is improper as Samsung has had the substance of this case since September 16, 2024 - over 4.5 months ago
 - The attorney-client privilege objection to a standard form interrogatory is improper, particularly without a privilege log identifying specific protected communications
 - The privacy interests of third parties (if any) can be addressed through redaction or a protective order
 - The claim that "discovery has only recently begun" is contradicted by the 4.5-month timeline. These interrogatories seek basic factual information about witnesses and documents related to the incident—information Samsung should readily have available.
2. ROG 112.3: Samsung partially responded despite raising objections, demonstrating the other objections are not actually preventing substantive responses.
3. ROG 112.4: Samsung's objections are without merit:
 - The "premature" objection fails for reasons stated above
 - The claim of burden is unsupported by any specific facts showing actual burden
 - The vagueness objection to "Identify" is improper as this term is defined in the interrogatories
 - The duplication objection fails as Form Interrogatories may properly overlap with other discovery
4. ROGs 114.1, 115.2, and 115.3: Samsung's objections fail:
 - Information being "in control of Plaintiff" is irrelevant as these interrogatories specifically seek Samsung's contentions and knowledge
 - The "premature" objection is improper given the timeline
 - No showing of actual burden has been made
 - The attorney-client privilege objection to a standard form interrogatory is improper, particularly without a privilege log identifying specific protected communications
5. ROGs 150.1-150.11: Samsung's objections lack merit:
 - The "agreement" referenced is clearly the warranty agreement identified in the complaint
 - Claims of vagueness are undermined by Samsung's clear understanding of the subject matter
 - The "premature" objection fails given the 4.5-month timeline
 - No specific showing of burden has been made

Requests for Production:

1. RFP Nos. 1-4 (seeking communications and documents about Plaintiff's dryer and service visits):
 - The overbreadth objection fails as these requests are narrowly tailored to the specific incident
 - Time/scope objections are improper as the relevant timeframe is inherently limited by the incident

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- Privacy objections can be addressed through a protective order
 - Third-party information claims are irrelevant as these documents are in Samsung's possession
 - Attorney-client privilege objections are improper without a privilege log
2. RFP Nos. 5-6 (warranty policies and training materials):
- While broader in scope, these requests are relevant to Samsung's policies and practices
 - Trade secret objections are unsupported by any showing of competitive harm
 - The term "appliances" clearly refers to dryers in context
 - Geographic scope can be reasonably limited to California
 - The relevant time period can be limited to when the warranty was in effect
3. RFP Nos. 7-8 (warranty claims and consumer complaints):
- Confidentiality concerns can be addressed through a protective order
 - The terms "strategies" and "practices" are clear in context
 - Geographic and temporal limitations can be reasonably negotiated
 - Privacy concerns can be addressed through redaction
 - The request is proportional given the claims at issue
4. RFP No. 9 (documents supporting defenses):
- The "premature" objection is particularly inappropriate after 4.5 months
 - Overbreadth objection fails as it's limited to claimed defenses
 - No showing of actual burden has been made
 - The request is fundamental to the litigation

We request that Samsung provide complete responses and responsive documents within 10 days, **by February 11, 2025**. The practice of serving nothing but boilerplate objections to every single discovery request is more reminiscent of a novice associate's first draft than the work product one expects from a leading international law firm. The disconnect between Greenberg's reputation for sophisticated litigation and these perfunctory responses is striking, and it compels us to question whether this approach truly serves your client's interests.

We are available to discuss these issues by phone, but absent substantial supplemental responses that comply with California law, we will seek court intervention. Please let us know your availability to meet and confer by phone next week.

Best Regards,



Jerry R. Dagrella
of DAGRELLA LAW FIRM, P.C.