

1 THE HONORABLE THOMAS S. ZILLY

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7 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 TICKETOPS CORPORATION,

C21-931 TSZ

10 Petitioner and  
11 Counter Respondent,

**ORDER GRANTING IN PART COSTCO  
WHOLESALE'S MOTION FOR  
INDIVIDUAL DISCOVERY**

12 v.

13 COSTCO WHOLESALE  
CORPORATION,

14 Respondent and  
15 Counter Petitioner.

16  
17 The Court, having considered Costco Wholesale Corporation's Motion for Individual  
18 Discovery, docket no. 49, and any papers filed in support of and in opposition to the motion,  
19 GRANTS IN PART the motion. The Court ORDERS TicketOps Corporation and its CEO Hugh  
20 Hall to produce the documents listed below no later than 30 days from the date of this Order.

21 The Court further ORDERS Mr. Hall to sit for a deposition, by remote means and not to  
22 exceed six (6) hours, on the topics below within 60 days of the date of this Order.

23 **Topics Covered by Previous Order, docket no. 32:**

- 24 1. "Assets" include cash assets. TicketOps must produce documents reflecting all asset  
25 transfers after April 18, 2021 (the arbitration award date), and those documents must  
26 be sufficient to identify both the transferee and the transferor.

ORDER GRANTING IN PART MOTION  
FOR INDIVIDUAL DISCOVERY  
(C21-931 TSZ) – 1

- 1 2. “Affiliates” include HMH Canadian Equities Inc. and any other entities that are  
2 “related to [TicketOps] by shareholdings or other means of control,” including  
3 “subsidiary, parent, or sibling corporation[s].” Affiliate, Black’s Law Dictionary  
4 (11th ed. 2019). TicketOps must identify all bank accounts and produce copies of all  
5 account statements for HMH and any other affiliates since April 18, 2021.
- 6 3. Prior productions should be updated from April 18, 2021, to the date of the above  
7 productions.

8 **Topics of Individual Discovery (since April 18, 2021):**

- 9 4. Identification of all bank accounts that have been maintained on behalf of Mr. Hall  
10 since April 18, 2021, and copies of all account statements since that date. This  
11 includes accounts in the name of Mr. Hall and any of his family who has held or is  
12 holding any moneys on behalf of Mr. Hall, and any person or entity that has received  
13 or is holding and funds or other assets on Mr. Hall’s behalf.
- 14 5. For the year 2021, personal income tax returns for Mr. Hall and income tax returns  
15 for any business in which Mr. Hall has had an interest.
- 16 6. Documents reflecting the current assets and liabilities of Mr. Hall, and all asset  
17 transfers in excess of \$5,000 United States dollars since April 18, 2021. This includes  
18 cash assets.
- 19 7. Documents reflecting all property owned, in whole or in part, by Mr. Hall between  
20 April 18, 2021, and the present, including but not limited to cash, stocks, notes,  
21 judgments, bonds, U.S. treasury bills, mutual funds, money market investments,  
22 equipment, machinery, tools, computers, artwork, and multi-media equipment.
- 23 8. Documents and records reflecting all real property owned, in whole or in part, by Mr.  
24 Hall since April 18, 2021.
- 25 9. Documents and records reflecting or referring to all mortgages or liens existing  
26 against the real property identified in Item 8.

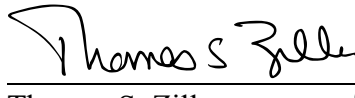
1 10. Certificates of title reflecting all vehicles owned, in whole or in part, by Mr. Hall  
2 since April 18, 2021, including but not limited to cars, trucks, motorcycles, boats, or  
3 recreational vehicles or vessels.

4 11. Documents reflecting proceeds from any sales by Mr. Hall since April 18, 2021, of  
5 any asset for \$25,000 or more.

6 12. Documents reflecting the existence of any security interest, sales contracts, or  
7 conditional sales contracts on the items of property owned by Mr. Hall.

8 13. Records of all accounts receivable, notes receivable, or indebtedness due with respect  
9 to Mr. Hall.

10  
11 DATED this 10th day of May, 2022.

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15 Thomas S. Zilly  
16 United States District Judge

17 Presented by:

18 s/ David J. Burman

19 David J. Burman, WSBA No. 10611

20 David T. Martin, WSBA No. 50160

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