

STATE OF MINNESOTA
COUNTY OF KANDIYOHI

DISTRICT COURT
EIGHTH JUDICIAL DISTRICT
Case Type: Civil Other/ Miscellaneous

Steve Quest,

Plaintiff,

v.

Nicholas Rekieta and Rekieta Law, LLC,

Defendants.

Court File No. 34-CV-23-12
Honorable Judge Stephen J. Wentzell

**DEFENDANTS NICHOLAS REKIETA
AND REKIETA LAW, LLC'S FIRST
SET OF INTERROGATORIES TO
PLAINTFF**

Defendants Nicholas Rekieta and Rekieta Law Firm, LLC, by and through their undersigned counsel, hereby submits their First Set of Interrogatories to Plaintiff Steve Quest pursuant to Rule 33 of the Minnesota Rules of Civil Procedure.

Plaintiff shall serve his written reply to these requests within thirty days of the date of service thereof on the offices of Defendants' counsel: Randazza Legal Group, PLLC, 8991 W. Flaming Road, Ste. B, Las Vegas, NV 89147. Alternatively, and preferably, Plaintiff may serve his responses to these Interrogatories via electronic mail to ecf@randazza.com.

DEFINITIONS

1. The terms "Rekieta," "Defendants," and "Defendant," encompass Nicholas Rekieta, including any of his other entities, companies, partnerships, or corporations. They also include all parent or subsidiary organizations, affiliates, chapters, agents, representatives, attorneys, or anyone else acting on its behalf and under Defendants'

control, and expressly includes but is not limited to Nicholas Rekieta, Rekieta Law, LLC, and Rekieta Media, LLC.

2. “Steve Quest”, “You”, “Yours”, and “Plaintiff” means Plaintiff Steve Quest, Roy Warren Marshall, and includes other names used by Plaintiff and others including an online handle, “Montagraph.”

3. “Communication” means any correspondence, email, contact, discussion, or any other kind of written or oral exchange or transmittal of information (in the form of facts, ideas, inquiries, or otherwise) and any response thereto between two or more persons or entities, including, without limitation, all telephone conversations, face-to-face meetings or conversations, internal or external discussions, or exchanges of a document or documents, whether directly or through “cc” copying.

4. “Document” shall have the meaning set forth in Rule 34(a) of the Minnesota Rules of Civil Procedure and shall therefore include, without limitation, any writing, email, text, chat, online post, recording, electronic image, photograph, computer data base, or other item containing information of any kind or nature, however produced or reproduced, whether an original or a duplicate, whatever its origin or location, and regardless of the form in which such information exists or is maintained.

5. “Person” means any natural person or any legal or business entity.

6. “And” means and/or and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses/documents that might otherwise be construed to be outside its scope.

7. A “representative” of a person means any officer, director, agent, employee, attorney, or other representative of such person.

8. The terms “relate” and “relating to” mean pertaining to, describing, referring to, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, about or in any way logically or factually connected with the matter discussed.

9. Whenever an individual or entity is referenced, it shall include all agents, employees, attorneys, officers, directors, trustees and other representatives of that individual or entity.

INSTRUCTIONS

1. Pursuant to Rule 33 of the Minnesota Rules of Civil Procedure, Plaintiff shall respond to these interrogatories within 30 days of service.

2. Each interrogatory solicits information obtainable by Plaintiff from Plaintiff’s attorneys, investigators, agents, employees, and representatives. If You answer an interrogatory on the basis that You lack sufficient information to respond, describe any and all efforts You made to inform Yourself of the facts and circumstances necessary to answer or respond.

3. In the event You claim privilege or work product protection with respect to any response, You must provide the requisite privilege log in the form set forth by Minnesota Rule of Civil Procedure 26.02(g).

4. In the event Your response to any interrogatory relies on any documents produced by either party in this case, identify such documents with specificity.

5. If an objection is made to any interrogatory herein, all information covered by the interrogatory not subject to the objection should be produced.

6. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a request all documents and/or things that might otherwise be construed to be outside of its scope.

7. The use of the singular form of any word includes the plural and vice versa.

8. The use of any tense of any verb includes also within its meaning all other tenses of the verb so used.

9. To the extent a time frame is relevant to answer any interrogatory, these interrogatories are intended to include all time from January 1, 2014, to the present and ongoing.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify in detail and describe all factual bases that you believe support or refute any inference that you may have engaged in inappropriate conduct with minors, including any facts, behaviors, or omissions you are aware of that may contribute to such an inference.

INTERROGATORY NO. 2:

Identify any statements made by you, including but not limited to social media posts, videos, photographs, or other materials that could be interpreted by a reasonable person as suggesting or implying that you engaged in inappropriate conduct with minors.

INTERROGATORY NO. 3:

State with specificity whether any other person has accused, called, or labeled you a pedophile, child molester, or similar term, and if so, identify the date, the person(s)

making the accusation, the circumstances, and any documents evidencing or related to such accusation.

INTERROGATORY NO. 4:

Identify and describe in detail all emotional distress, mental anguish, or psychological harm you claim to have suffered as a result of Defendants' conduct alleged in the Amended Complaint.

INTERROGATORY NO. 5:

Identify and describe in detail all documents, bills, or records that relate to or evidence the damages you claim to have suffered as a result of emotional distress or psychological harm caused by Defendants' conduct alleged in the Amended Complaint.

INTERROGATORY NO. 6:

Identify each and every health care provider, therapist, or counselor from whom you have sought or received treatment for emotional distress, mental anguish, or psychological harm allegedly caused by Defendants' conduct alleged in the Amended Complaint, including the dates of treatment, the nature of the treatment, and the costs incurred.

INTERROGATORY NO. 7:

Identify all persons who have knowledge of your emotional or psychological condition allegedly caused by Defendants' conduct alleged in the Amended Complaint, including family members, friends, coworkers, or medical professionals. For each identified individual, provide contact information for that individual, including the person's name, email address, home or business address, and telephone number,

INTERROGATORY NO. 8:

Identify all persons or entities who ceased doing business with you or withdrew business opportunities because of Defendants' conduct alleged in the Amended Complaint. For each identified individual or entity, provide contact information for that individual including the person or entity's name, email address, home or business address, and telephone number.

INTERROGATORY NO. 9:

Describe in detail all reputational harm you claim to have suffered as a result of Defendants' conduct alleged in the Amended Complaint, including any specific lost business opportunities, job offers, clients, employment, or income.

INTERROGATORY NO. 10:

State the total dollar amount or value of income, revenue, or business opportunities you claim to have lost as a result of Defendants' conduct alleged in the Amended Complaint, and identify all documents that support this claim.

INTERROGATORY NO. 11:

Describe in detail all steps you have taken to mitigate the harm you claim to have suffered as a result of Defendants' conduct alleged in the Amended Complaint, including emotional harm, reputational harm, or financial loss.

INTERROGATORY NO. 12:

Provide a detailed description of your professional activities as an entertainer, artist, and video producer, including the nature of your work, the platforms used for distribution, and your sources of income from January 1, 2020, to the present.

INTERROGATORY NO. 13:

State whether you have ever been investigated, charged, or convicted of any crimes, including but not limited to pedophilia or other crimes of moral turpitude, and provide details of any such investigations or proceedings.

INTERROGATORY NO. 14:

Describe any public statements, posts, or communications you have made about Defendant Nicholas Rekieta or Rekieta Law, LLC from January 1, 2022, to the present, including but not limited to social media posts, videos, or comments on livestreams.

INTERROGATORY NO. 15:

Identify all witnesses you intend to call at trial to support your claims and provide a summary of the testimony you expect each witness to provide

INTERROGATORY NO. 16:

State whether you contend that Defendants' statements were made with actual malice, and if so, provide all facts, documents, or evidence supporting your contention that Defendants knew the statements were false or acted with reckless disregard for their truth.of the testimony you expect each witness to provide.

INTERROGATORY NO. 17:

Identify all individuals, entities, or organizations you believe saw, heard, or were otherwise exposed to the allegedly defamatory statements made by Defendants, and describe how you became aware of their exposure to the statements.

INTERROGATORY NO. 18:

Describe in detail all communications you had with Defendant Nicholas Rekieta or any representative of Rekieta Law, LLC from January 1, 2020, to the present, including

but not limited to emails, text messages, social media messages, phone calls, or in-person conversations, and provide the dates, times, and content of each communication.

Dated: July 7, 2025.

Crown Law

By: /s/ Matt Kezhaya
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Randazza Legal Group, PLLC

/s/ Marc J. Randazza
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ecf@randazza.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 7, 2025, a true and correct copy of the foregoing document is being served via e-mail as follows:

Matthew D. Hardin
Hardin Law Office
101 Rainbow Bridge Drive # 11506
Livingston, TX 77399
matt@matthewhardin.com

ATTORNEY FOR PLAINTIFF

/s/ Marc J. Randazza
Marc J. Randazza