

1 ALFRED L. RINALDO, JR. (SBN 64521)  
2 LAW OFFICES OF ALFRED L. RINALDO, JR.  
3 1754 TECHNOLOGY DRIVE 120-F  
4 SAN JOSE, CA 95110  
5 408 232-5800

6 Attorneys for Plaintiff and  
7 Cross- Defendant  
8 YAANA TECHNOLOGIES, LLC

Electronically  
**RECEIVED**

4/17/2023

CLERK OF THE SUPERIOR COURT  
SAN MATEO COUNTY

Electronically  
**FILED**

By Superior Court of California, County of San Mateo  
ON 04/19/2023

By /s/ Claussen, Kimberly  
Deputy Clerk

9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF SAN MATEO

11  
12 YAANA TECHNOLOGIES, LLC,

13 PLAINTIFF,

14 vs.

15  
16 MEERA KAUL, AN INDIVIDUAL; OPTIMUS  
17 VENTURES, LLC; ET. AL.

18 DEFENDANTS.

Case No. 18-CIV-02373

SG

~~[PROPOSED]~~ JUDGMENT AFTER  
TRIAL

DATE: APRIL 12, 2023

TIME: 9:00 A.M.

DEPT: 3

COMPLAINT FILED: MAY 9, 2018

TRIAL DATE: APRIL 12, 2023

1 This matter came on for trial against Defendant and Cross- Complainant Meera Kaul  
2 in Department 3 of this Court on April 12, 2023. Alfred L. Rinaldo, Jr. appeared on behalf of  
3 Plaintiff and Cross-Defendant Yaana Technologies, LLC. Although duly notified of this trial  
4 date, Defendant and Cross- Complainant Meera Kaul failed to appear for trial.

5 The trial proceeded as scheduled. Plaintiff Yaana Technologies, LLC offered  
6 evidence in support of its First Cause of Action for Breach of Contract and in support of its  
7 Second Cause of Action for Fraud and Deceit against Defendant Meera Kaul, including  
8 evidence in support of its contention and Defendant Optimus Ventures, LLC and Defendant  
9 Meera Kaul were one and the same, and that the corporate veil of Defendant Optimus  
10 Ventures, LLC should therefore be pierced and shareholder and CEO Meera Kaul should  
11 be held personally liable on said First and Second Causes of Action.

12 The Court took judicial notice of the Declaration of Alfred L. Rinaldo, Jr. filed April  
13 12, 2023, attaching a copy of the Requests For Admission, Set Two (2), Requests 17  
14 through 35, from Yaana Technologies, LLC to Meera Kaul, which had been deemed  
15 admitted against Meera Kaul pursuant to Court Order dated April 4, 2023.  
16

17 The trial proceeded as scheduled on the Cross- Complaint of Cross-Complainant  
18 Meera Kaul against Yaana Technologies, LLC. Cross- Complainant Meera Kaul, not being  
19 present, did not offer any evidence in support of her Cross- Complaint, and the Court noted  
20 that Cross- Defendant Yaana Technologies, LLC had filed an Answer to the Cross-  
21 Complaint denying all allegations and denying any liability or damages alleged by Cross-  
22 Complainant Meera Kaul.

23 Therefore, having considered the evidence presented by Plaintiff and Cross-  
24 Defendant Yaana Technologies, LLC at the trial, and no evidence having been presented  
25 by Defendant and Cross- Complainant Meera Kaul at the trial, on the Complaint of Plaintiff  
26 Yaana Technologies, LLC and against Defendant Meera Kaul, the Court enters judgment in  
27 favor of Plaintiff Yaana Technologies, LLC and against Defendant Meera Kaul personally  
28 on Plaintiff's First Cause of Action for Breach of Contract and on Plaintiff's Second Cause

1 of Action for Fraud and Deceit. The Court finds that there was such a unity of interest and  
2 ownership between now bankrupt Defendant Optimus Ventures, LLC and Defendant Meera  
3 Kaul, its principal shareholder and CEO, that their separate personalities no longer existed,  
4 and that the failure to disregard the limited liability company as a corporate entity would  
5 sanction a fraud or promote injustice.

6 On the Complaint of Plaintiff Yaana Technologies, LLC against Defendant Meera  
7 Kaul, the Court awards damages in favor of Plaintiff Yaana Technologies, LLC and against  
8 Defendant Meera Kaul individually as follows: 1. Consequential damages in the amount of  
9 \$525,000.00; Interest at the legal rate of ten percent (10%) per annum from December 31,  
10 2017 through March 31, 2023 in the amount of \$275,625.00; 3. Punitive damages in the  
11 amount of \$150,000.00; and costs of \$945.00. The total of said damages awarded through  
12 the date of this judgment is \$951,570.00. In addition, Sanctions awarded in the amount of  
13 \$3060.00 pursuant to the Order Granting Plaintiff's Motion for Order Deeming Facts  
14 Admitted, Set Two (2) Against Defendant Meera Kaul, and for Sanctions, dated April 4,  
15 2023, which were not paid on April 11, 2023 as ordered by this Court , shall be added to  
16 this judgment, thereby bringing the total amount of this judgment to \$954,630.00. This total  
17 judgment amount of \$954,630.00 shall itself bear interest at the legal rate of ten percent  
18 (10%) per annum from April 1, 2023 until paid in full.

19 On the Cross- Complaint of Cross- Complainant Meera Kaul against Cross-  
20 Defendant Yaana Technologies, LLC, the Court enters judgment in favor of Cross-  
21 Defendant Yaana Technologies, LLC and against Cross- Complainant Meera Kaul.

22  
23 IT IS SO ORDERED.

24 Electronically

25 **SIGNED**

26 By /s/ Greenberg, Susan

27 Dated: 04/18/2023 \_\_\_\_\_

28 \_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT