

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Nicholas A. Ventura v. IQVIA Inc., et al.

Ventura · No. 25-cv-09163-RS · Decided January 12, 2026

SUMMARY

The United States District Court for the Northern District of California denied Plaintiff Nicholas A. Ventura’s motion to compel responses to special interrogatories and his request for sanctions. The court concluded that the interrogatories were not properly served and that discovery was sought before the parties held the required Rule 26(f) conference.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Richard Seeborg
JURISDICTION	United States District Court for the Northern District of California
DECIDED	January 12, 2026
DOCKET	25-cv-09163-RS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel responses to special interrogatories and requested attorney fees as sanctions.
PRECEDENTIAL VALUE	unpublished

TOPICS

- discovery dispute
- service of process
- sanctions
- civil procedure

PRACTICE AREAS

- civil procedure
- discovery

QUESTIONS PRESENTED

- Whether Defendants were required to respond to Plaintiff’s special interrogatories when the requests were not properly served under the Federal Rules of Civil Procedure.
- Whether Plaintiff could seek discovery before the parties held a qualifying Rule 26(f) conference.
- Whether Plaintiff was entitled to attorney fees as sanctions in connection with the motion to compel.

HOLDINGS

1. Because Plaintiff did not properly serve the interrogatories under Federal Rules of Civil Procedure 5(b) and 33, Defendants were not obligated to respond.
2. Parties may not seek discovery before holding a Rule 26(f) conference, and the conference identified by Defendants did not satisfy that requirement.
3. Plaintiff was not entitled to attorney fees as sanctions in connection with the unsuccessful motion to compel.

FACTUAL BACKGROUND

Plaintiff claimed that he served special interrogatories on Defendants through the federal court's CM/ECF system on November 2 and 3, 2025. The docket contained no such filing, and the evidence showed that the requests were instead served through the San Francisco Superior Court's electronic case-management system after removal of the action to federal court. Defendants also maintained that the parties' November 25, 2025 conference did not satisfy the required Rule 26(f) conference.

PROCEDURAL HISTORY

Plaintiff filed a motion to compel after serving purported discovery requests through an electronic case-management system associated with the San Francisco Superior Court. Defendants opposed the motion, asserting that the interrogatories were not properly served and that discovery was premature because the parties had not completed a qualifying Rule 26(f) conference. The district court denied the motion and sanctions request without oral argument and vacated the scheduled hearing.

DISPOSITION

other

CASES CITED

- *Rovio Entertainment Ltd. v. Royal Plush Toys, Inc.*, 907 F. Supp. 2d 1086, 1099 (N.D. Cal. 2012)