Pursuant to California Rules of Court, rule 3.1345, xxxx hereby submits its Separate Statement in Support of xxxxxx.

{%p for method in methods %}

**{{ method | upper }}**

{% for party in method.propounding\_parties %}{{ party.party\_role }}{% endfor %}’s Form/Special Interrogatories, Set No. {{ method.set\_no }}

{%p for ncr in method.ncr %}

**{{ language\_table[method | string][‘singular’] | capitalize }} {{ ncr }}:**

{%p for response in method.responses %}

{%p if response.name.text == ncr.name.text %}

{{ response.question }}

**{% for party in method.responding\_parties %}{{ party.party\_role }}{% endfor %}’s Response to {{ language\_table[method | string][‘singular’] | capitalize }} {{ ncr }}:**

{{ response.answer }}

{%p endif %}

{%p endfor %}

**Factual & Legal Reasons For Compelling Further Response:**

{% for party in method.responding\_parties %}{{ party.party\_role }}{% endfor %}’s response fails to comply with the Civil Discovery Act and is deficient for the following reasons:

{%p for deficiency in ncr.deficiencies.true\_values() %}

{{r dataloader.load\_row(to\_int(deficiency))["Summary"] | inline\_markdown }}

{{r dataloader.load\_row(to\_int(deficiency))["Blurb"] | inline\_markdown }}

{%p endfor %}

{%p if ncr.add\_custom\_critique %}

{{ ncr.custom\_critique }}

{%p endif %}

{%p endfor %}

{%p endfor %}