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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**  
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15 BRADFORD M. MARTINEZ, VICKI L.  
16 MARTINEZ, AND GAIL DIANE CALHOUN  
17 AKA GAIL DIANE HOUSER,

18 Plaintiffs,

19 vs

20 JENNIFER BURBANK AND JAMES  
21 BURBANK,

22 Defendants.

Case No. 25PDUD00999

[Assigned for All Purposes to the Hon. Jerry  
B. Marshak, Dept. R]

**PLAINTIFF'S REQUEST FOR SPECIAL  
INTERROGATORIES TO DEFENDANT  
JENNIFER BURBANK (SET NO. 1)**

**PROPOUNDING PARTY:** PLAINTIFF, BRADFORD M. MARTINEZ

**RESPONDING PARTY:** DEFENDANT, JENNIFER BURBANK

**SET NO:** One

PLEASE TAKE NOTICE that BRADFORD M. MARTINEZ, ("Propounding Party")  
hereby requests that you respond to the following set of Special Interrogatories – Set One  
separately and fully, in writing, and under oath pursuant to Code of Civil Procedure § 2030.010,  
*et seq.*, within 5 days after service. Bear in mind, an interrogatory is not objectionable because  
an answer to it involves an opinion or contention that relates to fact or the application of law to

fact, or would be based on information obtained or legal theories developed in anticipation of litigation or in preparation for trial. Code of Civil Procedure § 2030.010(b).

### **DEFINITIONS**

1. The word “YOU,” “YOUR” “YOURS,” and “YOURSELF” shall each refer to Defendant, Jennifer Burbank, including Jennifer Burbank’s past and present agents, representatives, assigns, and anyone directing Jennifer Burbank’s actions in the matter bearing case number 25PDUD00999 (“ACTION”).
2. The phrase “PROPOUNDING PARTY” shall mean Plaintiff, BRADFORD M. MARTINEZ, and shall include any of BRADFORD M. MARTINEZ’s representatives, employees, agents, or assigns as well as any parties directing BRADFORD M. MARTINEZ’s actions in this ACTION.
3. The word “COMMUNICATIONS” shall mean any document, oral statement, meeting or conference, formal or informal, at any time or place and under any circumstances whatsoever, whereby information of any nature was stated, written, recorded or in any matter transmitted or transferred.
4. The word “DOCUMENT” and “DOCUMENTS” shall mean any and all “writings,” as the term is defined in California Evidence Code Section 250 and California Code of Civil Procedure Section 2031.010, including, but not limited to any tangible items which contain handwriting, typewriting, printing, photostatic reproduction, photographic reproduction, electronic reproduction, and any other form of communications or representations whether produced, reproduced, or stored on paper, cards, tapes, discs, belts, charts, films (including microfilm or microfiche), computer storage devices or any other medium or recordation that are in YOUR possession, custody or control, or the possession, custody, or control of any of YOUR agents, attorneys, accountants, or representatives.
5. The word “PERSON” or “PERSONS” is defined consistent with California Evidence Code Section 175 and shall mean and include any natural person, corporation,

1 partnership, sole proprietorship, organization, association, federation, governmental  
2 entity or association, or any other kind of entity.

3 6. The terms “CONCERNING” and “REGARDING” means relating to, referring to,  
4 describing, evidencing, or constituting.

5 7. The term “SUPPORT” means to provide a factual or evidentiary basis for a claim,  
6 assertion, or legal position.

7 8. The phrase “PROPOUNDING PARTY” shall mean Defendant, Amanda Broadwell,  
8 and shall include any of Amanda Broadwell’s representatives, employees, agents, or  
9 assigns as well as any parties directing Amanda Broadwell’s actions in this ACTION.

10 9. The word “COMPLAINT” shall mean the ACTION’s underlying Complaint that  
11 Plaintiff filed on or about April 1, 2025, in the Superior Court of California, for the  
12 County of Los Angeles.

13 10. The word “NOTICE” shall mean the 60 – Day Notice to quit which was attached to the  
14 complaint as exhibit 2 dated January 29, 2025.

15 11. The word “LEASE” shall mean the Residential Lease or Month-to-Month Rental  
16 Agreement, bearing a commencement date of September 8, 2023 pursuant to which  
17 YOU occupy the PREMISES. Attached hereto as Exhibit 1 is a true and correct copy of  
18 the LEASE.

19 12. The word “RENT” shall mean the amount of money due monthly from YOU in  
20 exchange for which YOU are granted the right to occupy the PREMISES that are the  
21 subject of this ACTION.

22 13. The term “PREMISES” shall mean the real property commonly known as 518 North  
23 Stoneman Avenue, Alhambra CA 91801.

24 14. The term “REPAIRS” shall mean any work to correct, change, clean, ameliorate, or  
25 otherwise fix the PREMISES.  
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1 15. The term “HABITABILITY” shall mean the physical condition of a residential living  
2 space, including but not limited to, the condition of doors and walls, the accumulation  
3 of mold, and infestation of vermin and rodents.

4 16. The terms “all,” “any,” and “each” shall be construed as encompassing any and all.

5 17. The connectives “and” and “or” shall be construed either disjunctively or conjunctively  
6 as necessary to bring within the scope of the discovery request all responses that might  
7 otherwise be construed to be outside of its scope.

8 18. The use of the singular form of any word includes the plural and *vice versa*.

9 19. All definitions construed herein will retain their meaning irrespective of whether they  
10 are capitalized in the requests below.

11 **REQUEST FOR SPECIAL INTERROGATORIES**

12 **SPECIAL INTERROGATORY NO. 1**

13 DESCRIBE all DOCUMENTS that support YOUR contention in YOUR ANSWER that,  
14 “Plaintiff waived, changed, or canceled the notice to quit.”

15 **SPECIAL INTERROGATORY NO. 2**

16 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff served  
17 Defendant with the notice to quit or filed the complaint to retaliate against Defendant.”

18 **SPECIAL INTERROGATORY NO. 3**

19 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff’s demand  
20 for possession violates the local rent control or eviction control ordinance of [...] Tenant  
21 Protection Ordinance of 2019.”

22 **SPECIAL INTERROGATORY NO. 4**

23 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff failed to  
24 state a just cause for termination of tenancy in the written notice to terminate.”

25 **SPECIAL INTERROGATORY NO. 5**

26 DESCRIBE all DOCUMENTS that support YOUR contention that Plaintiff failed to  
27 comply with the relocation assistance requirements of Civil Code section 1946.2(d).  
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**SPECIAL INTERROGATORY NO. 6**

DESCRIBE all DOCUMENTS that support YOUR contention that, “Plaintiff violated the Tenant Protection Act in a manner that defeats the complaint.”

**SPECIAL INTERROGATORY NO. 7**

DESCRIBE all DOCUMENTS that support YOUR contention that, “Defendants submitted multiple habitability-related complaints [...] including complaints about persistent water intrusion in the garage area [...]”

**SPECIAL INTERROGATORY NO. 8**

“Defendants submitted multiple habitability-related complaints [...] including complaints about persistent water intrusion in the garage area [...] remains unresolved.”

**SPECIAL INTERROGATORY NO. 9**

DESCRIBE all DOCUMENTS that support YOUR response to the Form Interrogatories-General Set One.

**SPECIAL INTERROGATORY NO. 10**

DESCRIBE all DOCUMENTS that support YOUR responses to the Requests for Admissions Set One.

**SPECIAL INTERROGATORY NO. 11**

DESCRIBE all DOCUMENTS that DESCRIBE PERSONS YOU will call as witnesses during trial in this ACTION.

**SPECIAL INTERROGATORY NO. 12**

DESCRIBE all exhibits YOU intend to introduce at trial in this ACTION.

**SPECIAL INTERROGATORY NO. 13**

IDENTIFY all DOCUMENTS YOU intend to use as an exhibit at trial in this ACTION.

**SPECIAL INTERROGATORY NO. 14**

IDENTIFY all facts that support any defense to the COMPLAINT.

1 **SPECIAL INTERROGATORY NO. 15**

2 IDENTIFY all PERSONS with knowledge of any defenses YOU allege to the  
3 COMPLAINT.

4 **SPECIAL INTERROGATORY NO. 16**

5 IDENTIFY each DOCUMENT which supports the affirmative defenses YOU claim to  
6 have REGARDING this ACTION.

7 **SPECIAL INTERROGATORY NO. 17**

8 IDENTIFY all COMMUNICATIONS from October 2023 to the date of your response  
9 between YOU and PLAINTIFF REGARDING any PERSON occupying the PREMISES.

10 **SPECIAL INTERROGATORY NO. 18**

11 IDENTIFY each payment of RENT REGARDING the PREMISES YOU made to any  
12 PERSON from October 2023 to the date of your response.

13 **SPECIAL INTERROGATORY NO. 19**

14 IDENTIFY the circumstances by which YOU first received the NOTICE.

15 **SPECIAL INTERROGATORY NO. 20**

16 If YOU contend that any of the matters stated in the NOTICE are false, state each fact  
17 which supports that contention.

18 **SPECIAL INTERROGATORY NO. 21**

19 If YOU contend that PLAINTIFF does not have just cause to evict you from the  
20 PREMISES, state each fact which supports that contention.

21 **SPECIAL INTERROGATORY NO. 22**

22 EXPLAIN why RENT was not paid for the month of March 2025.

23 **SPECIAL INTERROGATORY NO. 23**

24 Is YOUR response to each request for admission served with these interrogatories an  
25 unqualified admission? If not, for each response that is not:

26 (a) State the number of the request;

27 (b) State all supporting facts;

1 (c) Provide the names, addresses, and phone numbers of all PERSONS with knowledge  
2 of those facts; and

3 (d) IDENTIFY all DOCUMENTS and tangible things that support your response and  
4 who has them.

5 **SPECIAL INTERROGATORY NO. 24**

6 State whether YOU have ever provided written or oral notice to PLAINTIFF of any  
7 alleged habitability issues REGARDING the PREMISES, and IDENTIFY the date, content, and  
8 recipient of each such notice.

9 **SPECIAL INTERROGATORY NO. 25**

10 IDENTIFY all requests for repairs or maintenance from YOU to PLAINTIFF  
11 REGARDING the PREMISES.

12 **SPECIAL INTERROGATORY NO. 26**

13 If YOU contend that any condition at the PREMISES justifies YOUR non-payment of  
14 RENT, IDENTIFY each such condition.

15 **SPECIAL INTERROGATORY NO. 27**

16 IDENTIFY any agreements, verbal or written, between YOU and PLAINTIFF that  
17 modify the LEASE, including the date and content of each agreement.

18 **SPECIAL INTERROGATORY NO. 28**

19 IDENTIFY all legal proceedings, prior or ongoing, REGARDING any unlawful detainer case in  
20 which YOU have been a defendant.

21 **SPECIAL INTERROGATORY NO. 29**

22 IDENTIFY all PERSONS who have visited the PREMISES from October 2023 through  
23 September 30, 2024, excluding PLAINTIFF or its agents.

24 **SPECIAL INTERROGATORY NO. 30**

25 IDENTIFY all PERSONS who have occupied the PREMISES from October 2023  
26 through September 2024, excluding PLAINTIFF or its agents.

1 Dated: June 6, 2025

*Anthony Marinaccio*

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3 ANTHONY MARINACCIO  
4 Attorney for the Plaintiffs  
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