

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 14**

2 As part of this meet and confer, Responding Party requests that Propounding Party define
3 the term “aware,” “served,” “submitted.” Subject to the foregoing objections, and without waiving
4 them, Responding Party responds as follows:

5 Responding Party lacks knowledge of actions taken by Propounding Party at the time the
6 NOTICE was served. Discovery is ongoing and it is anticipated that additional discovery and
7 further investigation, legal research and analysis will supply additional facts and provide new
8 and different meaning to known facts, and may establish new factual conclusions and legal
9 contentions, all of which may result in additional changes and/or variations from the responses
10 set herein and Responding Party reserves the right to supplement this response at a later time as
11 appropriate, up to and including at trial.
12

13 **SPECIAL INTERROGATORY NO. 15**

14 State all reasons why YOU served the NOTICE on or about January 30, 2025.

15 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 15**

16 Responding Party exercises its right to produce writings under Code of Civil Procedure
17 Section 2030.210(a)(2). See, 60 Day Notice to Quit (“60DN”) attached hereto or produced
18 concurrently herewith. Said 60DN was also attached as exhibit 2 to Plaintiff’s Complaint in the
19 present unlawful detainer matter. Robert L. Fernandez will occupy the underlying premises.
20 Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal
21 research and analysis will supply additional facts and provide new and different meaning to known
22 facts, and may establish new factual conclusions and legal contentions, all of which may result in
23 additional changes and/or variations from the responses set herein and Responding Party reserves
24 the right to supplement this response at a later time as appropriate, up to and including at trial.
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26 **SPECIAL INTERROGATORY NO. 16**

27 State all the reasons you gave DEFENDANT's for wanting them to vacate premises prior
28 to serving them with the NOTICE.

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1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 16**

2 As part of this meet and confer process, Responding Party requests that Propounding Party
3 rephrase this request. As phrased, request is incomprehensible leaving Responding Party unable
4 to determine what is being requested. Discovery is ongoing and it is anticipated that additional
5 discovery and further investigation, legal research and analysis will supply additional facts and
6 provide new and different meaning to known facts, and may establish new factual conclusions and
7 legal contentions, all of which may result in additional changes and/or variations from the
8 responses set herein and Responding Party reserves the right to supplement this response at a later
9 time as appropriate, up to and including at trial.
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11 **SPECIAL INTERROGATORY NO. 17**

12 Describe in detail how YOU and any PERSON acting on YOUR behalf responded to
13 DEFENDANT'S REPAIR REQUESTS made between September 2024 and January 2025.

14 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 17**

15 As part of this meet and confer, Responding Party requests that Propounding Party define
16 the term “describe in detail.” Because this request is compound, Responding Party also requests
17 that Propounding Party separate this request into separate questions. Subject to the foregoing
18 objections, and without waiving them, Responding Party responds as follows:

19 Responding Party exercises its right to produce writings under Code of Civil Procedure
20 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
21 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
22 further investigation, legal research and analysis will supply additional facts and provide new and
23 different meaning to known facts, and may establish new factual conclusions and legal contentions,
24 all of which may result in additional changes and/or variations from the responses set herein and
25 Responding Party reserves the right to supplement this response at a later time as appropriate, up
26 to and including at trial.
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1 **SPECIAL INTERROGATORY NO. 18**

2 IDENTIFY all DOCUMENTS referencing or CONCERNING communications between
3 PLAINTIFF and DEFENDANT between January 1, 2025, and January 30, 2025.

4 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 18**

5 As part of this meet and confer process, Responding Party requests that Propounding Party
6 separate this compound request into separate questions. Subject to the foregoing and previous
7 objections, and without waiving them, Responding Party responds as follows:

8 Responding Party exercises its right to produce writings under Code of Civil Procedure
9 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
10 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
11 further investigation, legal research and analysis will supply additional facts and provide new and
12 different meaning to known facts, and may establish new factual conclusions and legal contentions,
13 all of which may result in additional changes and/or variations from the responses set herein and
14 Responding Party reserves the right to supplement this response at a later time as appropriate, up
15 to and including at trial.

16 **SPECIAL INTERROGATORY NO. 19**

17 State whether YOU believe DEFENDANT'S REPAIR REQUESTS and COMPLAINTS
18 to government agencies were PROTECTED ACTIVITY under California law.

19 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 19**

20 As part of this meet and confer, Responding Party requests that Propounding Party define
21 the term "government agencies," "California law." Because this request is compound, Responding
22 Party also requests that Propounding Party separate this request into separate questions. Subject to
23 the foregoing objections, and without waiving them, Responding Party responds as follows:

24 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
25 with this request as propounded. Discovery is ongoing and it is anticipated that additional
26 discovery and further investigation, legal research and analysis will supply additional facts and
27 provide new and different meaning to known facts, and may establish new factual conclusions and
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1 legal contentions, all of which may result in additional changes and/or variations from the
2 responses set herein and Responding Party reserves the right to supplement this response at a later
3 time as appropriate, up to and including at trial.

4 **SPECIAL INTERROGATORY NO. 20**

5 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
6 had complained about water intrusion at the PREMISES.

7 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 20**

8 As part of this meet and confer, Responding Party requests that Propounding Party define
9 the term “aware,” “water intrusion,” “complained.” Subject to the foregoing objections, and
10 without waiving them, Responding Party responds as follows:

11 See response to Special Interrogatory No. 11. Discovery is ongoing and it is anticipated
12 that additional discovery and further investigation, legal research and analysis will supply
13 additional facts and provide new and different meaning to known facts, and may establish new
14 factual conclusions and legal contentions, all of which may result in additional changes and/or
15 variations from the responses set herein and Responding Party reserves the right to supplement
16 this response at a later time as appropriate, up to and including at trial.

17 **SPECIAL INTERROGATORY NO. 21**

18 IDENTIFY the date YOU first received a REPAIR REQUEST from DEFENDANT
19 CONCERNING water intrusion at the PREMISES.

20 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 21**

21 As part of this meet and confer, Responding Party requests that Propounding Party define
22 the term “received,” “water intrusion.” Subject to the foregoing objections, and without waiving
23 them, Responding Party responds as follows:

24 See responses to Special Interrogatory Nos. 11, 20. Discovery is ongoing and it is
25 anticipated that additional discovery and further investigation, legal research and analysis will
26 supply additional facts and provide new and different meaning to known facts, and may establish
27 new factual conclusions and legal contentions, all of which may result in additional changes and/or
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1 variations from the responses set herein and Responding Party reserves the right to supplement
2 this response at a later time as appropriate, up to and including at trial.

3 **SPECIAL INTERROGATORY NO. 22**

4 IDENTIFY all REPAIR REQUESTS received from DEFENDANT between September 1,
5 2024, and January 30, 2025.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 22**

7 Responding Party exercises its right to produce writings under Code of Civil Procedure
8 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
9 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
10 further investigation, legal research and analysis will supply additional facts and provide new and
11 different meaning to known facts, and may establish new factual conclusions and legal contentions,
12 all of which may result in additional changes and/or variations from the responses set herein and
13 Responding Party reserves the right to supplement this response at a later time as appropriate, up
14 to and including at trial.

15 **SPECIAL INTERROGATORY NO. 23**

16 Describe all actions YOU took in response to DEFENDANT'S REPAIR REQUESTS
17 referenced in Interrogatory No. 22.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 23**

19 As part of this meet and confer, Responding Party requests that Propounding Party define
20 the term "describe," "all actions." Subject to the foregoing objections, and without waiving them,
21 Responding Party responds as follows:

22 Responding Party exercises its right to produce writings under Code of Civil Procedure
23 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
24 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
25 further investigation, legal research and analysis will supply additional facts and provide new and
26 different meaning to known facts, and may establish new factual conclusions and legal contentions,
27 all of which may result in additional changes and/or variations from the responses set herein and
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