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Attorney for Plaintiffs, Bradford M. Martinez, Vicki L. Martinez, and Gail Diane Calhoun AKA
Gail Diane Houser

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE

BRADFORD M. MARTINEZ, VICKI L.)	CASE NO. 25PDUD00999
MARTINEZ AND GAIL DIANE)	
CALHOUN AKA GAIL DIANE HOUSER)	[Assigned for all purposes to the Hon.
)	Jerry B. Marshak, Dept. R]
Plaintiffs,)	
)	PLAINTIFF'S RESPONSE TO FORM
v.)	INTERROGATORIES – UNLAWFUL
)	DETAINER
JENNIFER BURBANK AND JAMES)	
BURBANK)	Complaint Filed: April 1, 2025
)	
Defendants,)	Trial Date: June 3, 2025
)	
)	

PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

SET NO.: One

BRADFORD M. MARTINEZ ("Responding Party") hereby provides its response to
JENNIFER BURBANK'S ("Propounding Party") Form Interrogatories-Unlawful Detainer (Set
One) as follows:

PRELIMINARY STATEMENT

These responses are made only for the purpose of the within action. Each response or
answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility

1 and any other objections and grounds that would require the exclusion of any statement herein if
2 any document was asked of, or if any statement contained therein were made by a witness present
3 and testifying in court, all of which objections and grounds are reserved and may be interposed at
4 the time of trial.

5
6 Plaintiff is responding to all Requests to the extent that information has become known
7 by him. However, this Responding Party's discovery, investigation and preparation for trial of
8 this matter has not been completed as of the date of these responses, and, therefore, Plaintiff does
9 not purport to state anything more than information presently known and discovered by him.

10
11 Plaintiff, in responding to these Requests, reserves the right to continue discovery and
12 investigation in this matter for facts, witnesses and supporting data that may recall information
13 which, if he had presently within his knowledge, would be included in these responses. For
14 example, to the extent that any request calls for the identification of "all documents," it is
15 responded to fully insofar as information is presently available to Plaintiff, and Plaintiff is not
16 precluded from presenting at trial information discovered after the date of the response of this
17 request.

18
19 This preliminary statement is incorporated into each of the responses set forth below.

20 **GENERAL OBJECTIONS**

21
22 To avoid repetition in setting forth specific objections to interrogatories, Responding Party
23 sets forth and incorporates the following objections to Responding Party's each and every
24 response.

25 **A. RELEVANCY OBJECTION**

26
27 Responding Party objects on the basis that the interrogatory, in whole or in part, seek the
28 disclosure of information that is neither relevant to the subject matter of the action nor reasonably

1 calculated to lead to the discovery of admissible evidence.

2 B. CONFIDENTIALITY/PRIVACY OBJECTION

3 Responding Party objects on the basis that the interrogatory seeks the disclosure of confidential
4 information and constitutes an attempt to invade the personal and/or financial privacy of certain
5 individuals or persons.
6

7 C. OVERBREADTH AND BURDEN OBJECTION

8 Responding Party objects on the basis that the interrogatory is overbroad, burdensome and
9 oppressive in that they seek the disclosure of information that has little or no practical benefit to
10 Propounding Party while placing an unwarranted burden or expense on the Responding Party in
11 ascertaining such information. Further, such interrogatory is so broadly drawn that although it
12 may include some relevant information within its scope, it includes information that is irrelevant
13 or immaterial to the instant action. Such interrogatory seeks information which is cumulative
14 and/or would require the compilation of extensive and detailed information from numerous
15 potential sources, many of which is not easily identifiable or available. A search for all such
16 information will in many instances involve enormous amounts of time by Responding Party.
17 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.
18
19

20 D. AMBIGUITY OBJECTION

21 Responding Party objects on the basis that the interrogatory is phrased in language that is
22 vague, ambiguous, and uncertain such that Responding Party is unable to ascertain what
23 information is sought and in order to respond to this interrogatory, Responding Party would have
24 to speculate as to Propounding Party's intended meaning.
25
26

27 E. AVAILABILITY OBJECTION

28 Responding Party objects on the basis that the interrogatory is equally accessible to all parties

1 or is more accessible to the Propounding Party or which is maintained primarily by persons or
2 entities other than Responding Party.

3 F. IMPROPER FORM OBJECTION
4

5 Responding Party objects on the basis that the interrogatory is phrased in improper form
6 because the interrogatory is not “full and complete in and of itself”; or because it contains subpart,
7 “compound, conjunctive or disjunctive” question, such that the interrogatory does not comply with
8 the requirements of *California Code of Civil Procedure* §2030.060
9

10 G. LEGAL CONCLUSION OBJECTION

11 Responding Party objects on the basis that the interrogatory calls for a legal conclusion.

12 H. ATTORNEY WORK-PRODUCT OBJECTION

13 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks
14 disclosure of information that is protected under the attorney work-product doctrine.
15

16 I. MARITAL PRIVILEGE OBJECTION

17 Responding Party objects on the basis that the request, in whole or in part, seeks disclosure of
18 information that is protected under marital privilege.
19

20 **RESPONSES TO FORM INTERROGATORIES (SET ONE)**

21 **FORM INTERROGATORY 70.1**

22 Anthony Marinaccio, Marinaccio Law, 225 W Broadway, Suite 103, Glendale, CA
23 91204; (818) 839-52520

24 **FORM INTERROGATORY 70.2**

25 Yes. Responding Party exercises its right to produce writings under Code of Civil
26 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
27 discovery and further investigation, legal research and analysis will supply additional facts and
28

1 provide new and different meaning to known facts, and may establish new factual conclusions
2 and legal contentions, all of which may result in additional changes and/or variations from the
3 responses set herein and Responding Party reserves the right to supplement this response at a
4 later time as appropriate, up to and including at trial.
5

6 FORM INTERROGATORY 70.3

7 Yes. Responding Party exercises its right to produce writings under Code of Civil
8 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
9 discovery and further investigation, legal research and analysis will supply additional facts and
10 provide new and different meaning to known facts, and may establish new factual conclusions
11 and legal contentions, all of which may result in additional changes and/or variations from the
12 responses set herein and Responding Party reserves the right to supplement this response at a
13 later time as appropriate, up to and including at trial.
14

15 FORM INTERROGATORY 70.4

16 No.
17

18 FORM INTERROGATORY 70.5

19 No.
20

21 FORM INTERROGATORY 70.6

22 No.
23

24 FORM INTERROGATORY 70.7

25 Yes. Responding Party exercises its right to produce writings under Code of Civil
26 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
27 discovery and further investigation, legal research and analysis will supply additional facts and
28 provide new and different meaning to known facts, and may establish new factual conclusions

1 and 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
3 later time as appropriate, up to and including at trial.

4 FORM INTERROGATORY 70.8

5
6 Yes. Responding Party exercises its right to produce writings under Code of Civil
7 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
8 discovery and further investigation, legal research and analysis will supply additional facts and
9 provide new and different meaning to known facts, and may establish new factual conclusions
10 and legal contentions, all of which may result in additional changes and/or variations from the
11 responses set herein and Responding Party reserves the right to supplement this response at a
12 later time as appropriate, up to and including at trial.

13 FORM INTERROGATORY 70.9

14
15 On or about 09/08/2023.

16 FORM INTERROGATORY 70.10

17
18 Yes. Responding Party exercises its right to produce writings under Code of Civil
19 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
20 discovery and further investigation, legal research and analysis will supply additional facts and
21 provide new and different meaning to known facts, and may establish new factual conclusions
22 and legal contentions, all of which may result in additional changes and/or variations from the
23 responses set herein and Responding Party reserves the right to supplement this response at a
24 later time as appropriate, up to and including at trial.

25 FORM INTERROGATORY 70.11

26
27 (a) Responding Party exercises its right to produce writings under Code of Civil Procedure
28

Section 2030.210(a)(2); Plaintiff, who can be contacted through their counsel of record.
Defendant;

(b) None;

(c) None;

(d) Responding Party exercises its right to produce writings under Code of Civil Procedure

Section 2030.210(a)(2); Plaintiff, who can be contacted through their counsel of record.
Defendant;

(e) None, to Responding Party's current knowledge;

FORM INTERROGATORY 70.12

(a) Lotus Property Management (Grace Cheng), 4157 East Live Oak Ave., Arcadia, CA
91006;

(b) From on or about September 1, 2024 through December 1, 2024;

(c) General property management.

(a) Bradford M. Martinez; who can be contacted through their counsel of record;

(b) From on or about December 2, 2024 through the present date;

(c) General property management.

(a) Deen Houser; who can be contacted through Responding Party's counsel of record;

(b) From on or about December 2, 2024 through the present date;

(c) General property management.

FORM INTERROGATORY 70.13

Responding Party exercises its right to produce writings under Code of Civil Procedure
Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
further investigation, legal research and analysis will supply additional facts and provide new

1 and different meaning to known facts, and may establish new factual conclusions and legal
2 contentions, all of which may result in additional changes and/or variations from the responses
3 set herein and Responding Party reserves the right to supplement this response at a later time as
4 appropriate, up to and including at trial.
5

6 FORM INTERROGATORY 70.14

7 Responding Party exercises its right to produce writings under Code of Civil Procedure
8 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
9 further investigation, legal research and analysis will supply additional facts and provide new
10 and different meaning to known facts, and may establish new factual conclusions and legal
11 contentions, all of which may result in additional changes and/or variations from the responses
12 set herein and Responding Party reserves the right to supplement this response at a later time as
13 appropriate, up to and including at trial.
14

15 FORM INTERROGATORY 71.1

16 Yes.
17

18 FORM INTERROGATORY 71.2

19 (a) Responding Party exercises its right to produce writings under Code of Civil Procedure
20 Section 2030.210(a)(2);
21

22 (b) Responding Party, who can be contacted through Responding Party's counsel of record;
23 Defendant;
24

25 (c) Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2). Responding Party, who can be contacted through their counsel of
27 record; Defendant.
28

1 FORM INTERROGATORY 71.3

2 Responding Party exercises its right to produce writings under Code of Civil Procedure
3 Section 2030.210(a)(2).
4
5

<u>Date</u>	<u>Activity</u>	<u>Purpose</u>	<u>Amount</u>
<u>1/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for "518</u> <u>stoneman feb 2024</u> <u>rent"; Conf#...</u>	<u>February 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>1/31/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "518 Stoneman</u> <u>Feb"; Conf#</u> <u>vm20wywxq</u>	<u>February 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>2/28/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "518 Stoneman";</u> <u>Conf# smwaugbt</u>	<u>March 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>3/1/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for "518</u> <u>N Stoneman Ave -</u> <u>March 2024";...</u>	<u>March 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>3/26/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "April Stoneman</u> <u>rent"; Conf#</u> <u>y7st738bg</u>	<u>April 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>3/27/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for</u> <u>"April rent - 518 N</u> <u>Stoneman Ave";...</u>	<u>April 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>4/26/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "May Stoneman";</u>	<u>May 2024 Rent</u>	<u>\$ 2,000.00</u>

Conf# yvu6sr5ug

<u>4/26/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman ave rent - may 2024";...</u>	<u>May 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>5/31/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# tybhj734u</u>	<u>June 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>5/31/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman -june rent"; Conf#...</u>	<u>June 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>7/1/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# vt73oxeo4</u>	<u>July 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>7/1/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman-july rent"; Conf#...</u>	<u>July 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>8/1/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# zmx4bqe3</u>	<u>August 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>8/1/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman - August rent"; Conf#...</u>	<u>August 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>9/3/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# vipl8j3m6</u>	<u>September 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>9/3/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman - september rent"; Conf#...</u>	<u>September 2024 Rent</u>	<u>\$ 1,250.00</u>

<u>10/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>October 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>11/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>November 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>12/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>December 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>12/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for</u> <u>January Rent - Part 1</u> <u>of 2"; Conf#</u> <u>99atqz8ws"</u>	<u>January 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>12/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for</u> <u>January rent - Part 2</u> <u>of 2"; Conf#</u> <u>99ats9vkh"</u>	<u>January 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>1/31/2025</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for 518</u> <u>stoneman february</u> <u>rent - part 1 of 2";</u> <u>Conf# 99awlsqtr"</u>	<u>February 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>2/3/2025</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for 518</u> <u>stoneman february</u> <u>rent - part 2 of 2";</u> <u>Conf# 99awp9ekt"</u>	<u>February 2025 Rent</u>	<u>\$ 1,625.00</u>

Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal research and analysis will supply additional facts and provide new and different meaning to known facts, and may establish new factual conclusions and legal contentions, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as

appropriate, up to and including at trial.

FORM INTERROGATORY 71.4

No.

FORM INTERROGATORY 71.5

No.

FORM INTERROGATORY 71.6

No.

FORM INTERROGATORY 71.7

Not to Responding Party's current knowledge. Responding Party exercises its right to produce writings under Code of Civil Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal research and analysis will supply additional facts and provide new and different meaning to known facts, and may establish new factual conclusions and legal contentions, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

FORM INTERROGATORY 72.2

Yes, via registered process server. Responding Party exercises its right to produce writings under Code of Civil Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal research and analysis will supply additional facts and provide new and different meaning to known facts, and may establish new factual conclusions and legal contentions, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

1 FORM INTERROGATORY 73.1

2 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
3 a defendant denies allegations that defendant’s continued possession is malicious, then either
4 party may ask any applicable question in this section.” No allegation is made in the underlying
5 unlawful detainer complaint bearing case number 25PDUD00999 (“Action”) that defendant’s
6 continued possession is malicious. Given the current state of the facts, this question is not
7 designed to lead to the discovery of admissible evidence.
8

9 FORM INTERROGATORY 73.2

10 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
11 a defendant denies allegations that defendant’s continued possession is malicious, then either
12 party may ask any applicable question in this section.” No allegation is made in the Action that
13 defendant’s continued possession is malicious. Given the current state of the facts, this question
14 is not designed to lead to the discovery of admissible evidence.
15

16 FORM INTERROGATORY 73.3

17 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
18 a defendant denies allegations that defendant’s continued possession is malicious, then either
19 party may ask any applicable question in this section.” No allegation is made in the underlying
20 unlawful detainer complaint bearing case number 25PDUD00999 (“Action”) that defendant’s
21 continued possession is malicious. Given the current state of the facts, this question is not
22 designed to lead to the discovery of admissible evidence.
23

24 FORM INTERROGATORY 74.1

25 Yes.
26

27 FORM INTERROGATORY 74.2
28

1 (a) The Tenant Protection Act of 2019, codified at California Civil Code Section 1946.2;

2 (b) California.

3 FORM INTERROGATORY 74.3

4 No.

5 FORM INTERROGATORY 74.4

6 Yes.

7 a. Robert Fernandez;

8 b. 1 E Commonwealth Ave, Alhambra, CA 91801; 1220 Mariposa St, Glendale, CA 91205;

9 c. Father/Father-in-Law;

10 d. Return to the RENTAL UNIT which he previously resided in;

11 e. None. See response to FORM Interrogatory-UD No. 70.6 herein.

12 FORM INTERROGATORY 74.5

13 No. Responding Party exercises its right to produce writings under Code of Civil
14 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
15 discovery and further investigation, legal research and analysis will supply additional facts and
16 provide new and different meaning to known facts, and may establish new factual conclusions
17 and legal contentions, all of which may result in additional changes and/or variations from the
18 responses set herein and Responding Party reserves the right to supplement this response at a
19 later time as appropriate, up to and including at trial.

20 FORM INTERROGATORY 74.6

21 No.

22 FORM INTERROGATORY 75.1

23 OBJECTION. Relevance. The prefatory statement which proceeds this section states, "If

1 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
2 or express breach of warranty to provide habitable residential premises, then either party may ask
3 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
4 Action. Given the current state of the facts, this question is not designed to lead to the discovery
5 of admissible evidence.
6

7 FORM INTERROGATORY 75.2

8 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
9 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
10 or express breach of warranty to provide habitable residential premises, then either party may ask
11 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
12 Action. Given the current state of the facts, this question is not designed to lead to the discovery
13 of admissible evidence.
14

15 FORM INTERROGATORY 75.3

16 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
17 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
18 or express breach of warranty to provide habitable residential premises, then either party may ask
19 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
20 Action. Given the current state of the facts, this question is not designed to lead to the discovery
21 of admissible evidence.
22

23 FORM INTERROGATORY 75.4

24 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
25 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
26 or express breach of warranty to provide habitable residential premises, then either party may ask
27
28

any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this Action. Given the current state of the facts, this question is not designed to lead to the discovery of admissible evidence.

FORM INTERROGATORY 75.5

OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied or express breach of warranty to provide habitable residential premises, then either party may ask any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this Action. Given the current state of the facts, this question is not designed to lead to the discovery of admissible evidence.

FORM INTERROGATORY 75.6

OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied or express breach of warranty to provide habitable residential premises, then either party may ask any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this Action. Given the current state of the facts, this question is not designed to lead to the discovery of admissible evidence.

FORM INTERROGATORY 75.7

OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied or express breach of warranty to provide habitable residential premises, then either party may ask any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this Action. Given the current state of the facts, this question is not designed to lead to the discovery

1 of admissible evidence.

2 FORM INTERROGATORY 75.8

3 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
4 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
5 or express breach of warranty to provide habitable residential premises, then either party may ask
6 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
7 Action. Given the current state of the facts, this question is not designed to lead to the discovery
8 of admissible evidence.
9

10 FORM INTERROGATORY 76.1

11 No
12

13 FORM INTERROGATORY 76.2

14 No. Responding Party exercises its right to produce writings under Code of Civil
15 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional
16 discovery and further investigation, legal research and analysis will supply additional facts and
17 provide new and different meaning to known facts, and may establish new factual conclusions
18 and legal contentions, all of which may result in additional changes and/or variations from the
19 responses set herein and Responding Party reserves the right to supplement this response at a
20 later time as appropriate, up to and including at trial.
21

22 FORM INTERROGATORY 77.1

23 Responding Party exercises its right to produce writings under Code of Civil Procedure
24 Section 2030.210(a)(2). 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
26 and different meaning to known facts, and may establish new factual conclusions and legal
27
28

1 contentions, all of which may result in additional changes and/or variations from the responses
2 set herein and Responding Party reserves the right to supplement this response at a later time as
3 appropriate, up to and including at trial

4 FORM INTERROGATORY 78.1

5
6 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
7 a defense is based on nonperformance of the rental agreement by the LANDLORD or someone
8 acting on the LANDLORD’S behalf, then either party may ask any applicable question in this
9 section.” A defense based on nonperformance of the rental agreement by the LANDLORD or
10 someone acting on the LANDLORD’S behalf has not been made by defendant. Given the current
11 state of the facts, this question is not designed to lead to the discovery of admissible evidence.

12 FORM INTERROGATORY 78.2

13
14 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
15 a defense is based on nonperformance of the rental agreement by the LANDLORD or someone
16 acting on the LANDLORD’S behalf, then either party may ask any applicable question in this
17 section.” A defense based on nonperformance of the rental agreement by the LANDLORD or
18 someone acting on the LANDLORD’S behalf has not been made by defendant. Given the current
19 state of the facts, this question is not designed to lead to the discovery of admissible evidence.

20 FORM INTERROGATORY 79.1

21
22 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
23 a defense is based on an offer of rent by a defendant which was refused, then either party may
24 ask any applicable question in this section.” A defense based on an offer of rent by a defendant
25 which was refused has not been made by defendant. Given the current state of the facts, this
26 question is not designed to lead to the discovery of admissible evidence.
27
28

1 FORM INTERROGATORY 80.1

2 No. Discovery is ongoing and it is anticipated that additional discovery and further
3 investigation, legal research and analysis will supply additional facts and provide new and
4 different meaning to known facts, and may establish new factual conclusions and legal
5 contentions, all of which may result in additional changes and/or variations from the responses
6 set herein and Responding Party reserves the right to supplement this response at a later time as
7 appropriate, up to and including at trial.
8

9 FORM INTERROGATORY 80.2

10 None, to Responding Party's current knowledge. See response to Form Interrogatory No.
11 80.1 herein. Discovery is ongoing and it is anticipated that additional discovery and further
12 investigation, legal research and analysis will supply additional facts and provide new and
13 different meaning to known facts, and may establish new factual conclusions and legal
14 contentions, all of which may result in additional changes and/or variations from the responses
15 set herein and Responding Party reserves the right to supplement this response at a later time as
16 appropriate, up to and including at trial.
17
18

19 FORM INTERROGATORY 80.3

20 See response to Form Interrogatory No. 80.1 herein. Discovery is ongoing and it is
21 anticipated that additional discovery and further investigation, legal research and analysis will
22 supply additional facts and provide new and different meaning to known facts, and may establish
23 new factual conclusions and legal contentions, all of which may result in additional changes
24 and/or variations from the responses set herein and Responding Party reserves the right to
25 supplement this response at a later time as appropriate, up to and including at trial.
26
27

28 FORM INTERROGATORY 80.4

1 See response to Form Interrogatory No. 80.1 herein. Discovery is ongoing and it is
2 anticipated that additional discovery and further investigation, legal research and analysis will
3 supply additional facts and provide new and different meaning to known facts, and may establish
4 new factual conclusions and legal contentions, all of which may result in additional changes
5 and/or variations from the responses set herein and Responding Party reserves the right to
6 supplement this response at a later time as appropriate, up to and including at trial.
7

8 FORM INTERROGATORY 80.5

9 See response to Form Interrogatory No. 80.1 herein. Discovery is ongoing and it is
10 anticipated that additional discovery and further investigation, legal research and analysis will
11 supply additional facts and provide new and different meaning to known facts, and may establish
12 new factual conclusions and legal contentions, all of which may result in additional changes
13 and/or variations from the responses set herein and Responding Party reserves the right to
14 supplement this response at a later time as appropriate, up to and including at trial.
15

16 FORM INTERROGATORY 80.6

17
18 OBJECTION. Relevance. See response to Form Interrogatory No. 80.1 herein. Discovery
19 is ongoing and it is anticipated that additional discovery and further investigation, legal research
20 and analysis will supply additional facts and provide new and different meaning to known facts,
21 and may establish new factual conclusions and legal contentions, all of which may result in
22 additional changes and/or variations from the responses set herein and Responding Party reserves
23 the right to supplement this response at a later time as appropriate, up to and including at trial.
24

25 FORM INTERROGATORY 81.1

26 Yes.

27 (a) \$108.33 per day;
28

1 (b) The current monthly rental amount paid by Defendant, the LEASE;

2 (c) The current monthly rental amount due of \$3,250 divided by 30.

3 FORM INTERROGATORY 81.2

4 No

5 FORM INTERROGATORY 81.3

6 Not to Responding Party's current knowledge. Discovery is ongoing and it is anticipated
7 that additional discovery and further investigation, legal research and analysis will supply
8 additional facts and provide new and different meaning to known facts, and may establish new
9 factual conclusions and legal contentions, all of which may result in additional changes and/or
10 variations from the responses set herein and Responding Party reserves the right to supplement
11 this response at a later time as appropriate, up to and including at trial.

12 DATED: May 30, 2025

MARINACCIO LAW

13 BY: /S/

14 Anthony Marinaccio, Esq.
15 Attorney for Plaintiffs, Bradford M.
16 Martinez, Vicki L. Martinez, and Gail Diane
17 Calhoun AKA Gail Diane Houser