

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

7 **SPECIAL INTERROGATORY NO. 4**

8 STATE all actions YOU took to address DEFENDANT'S REPAIR REQUESTS in 2024.

9
10 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 4**

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

19
20 **SPECIAL INTERROGATORY NO. 5**

21 STATE all actions YOU took to address DEFENDANT'S REPAIR REQUESTS in 2025.

22
23 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 5**

24 Responding Party exercises its right to produce writings under Code of Civil Procedure
25 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
26 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
27 further investigation, legal research and analysis will supply additional facts and provide new and
28

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.

SPECIAL INTERROGATORY NO. 6

State the date on which YOU first formed the intent to have Robert L. Fernandez move into the PREMISES.

SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 6

As part of this meet and confer, Responding Party requests that Propounding Party define the term “date,” “intent.” Subject to the foregoing objections, and without waiving them, Responding Party responds as follows: The “intent” was not “formed” by Responding Party. 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.

SPECIAL INTERROGATORY NO. 7

Describe in detail all facts that support YOUR contention that Robert L. Fernandez intended to move into the PREMISES at the time the NOTICE was served.

SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 7

As part of this meet and confer, Responding Party requests that Propounding Party define the term “describe,” “all facts,” “contention.” Subject to the foregoing objections, and without waiving them, Responding Party responds as follows:

Robert L. Fernandez lived at Glen Park Assisted Living in Glendale, to care for his wife, Carol, during her battle with Alzheimer’s Disease until she passed away in hospice care in February 2023. Robert has expressed his desire to return to the PREMISES since her passing.

Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal

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

5 **SPECIAL INTERROGATORY NO. 8**

6 IDENTIFY all DOCUMENTS that support YOUR contention that Robert L. Fernandez
7 intended to move into the PREMISES at the time the NOTICE was served.

8 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 8**

9 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
10 with this request because no such DOCUMENTS exist. Discovery is ongoing and it is anticipated
11 that additional discovery and further investigation, legal research and analysis will supply
12 additional facts and provide new and different meaning to known facts, and may establish new
13 factual conclusions and legal contentions, all of which may result in additional changes and/or
14 variations from the responses set herein and Responding Party reserves the right to supplement
15 this response at a later time as appropriate, up to and including at trial.

16 **SPECIAL INTERROGATORY NO. 9**

17 State the current address of Robert L. Fernandez.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 9**

19 1 E Commonwealth Ave., Alhambra, CA 91801. Discovery is ongoing and it is anticipated
20 that additional discovery and further investigation, legal research and analysis will supply
21 additional facts and provide new and different meaning to known facts, and may establish new
22 factual conclusions and legal contentions, all of which may result in additional changes and/or
23 variations from the responses set herein and Responding Party reserves the right to supplement
24 this response at a later time as appropriate, up to and including at trial

25 **SPECIAL INTERROGATORY NO. 10**

26 State the name and address of any ASSISTED LIVING FACILITY in which Robert L.
27 Fernandez resided at any time between July 2024 and January 2025.

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 10**

2 Savant Senior Living, 1 E Commonwealth Ave., Alhambra, CA 91801. Discovery is
3 ongoing and it is anticipated that additional discovery and further investigation, legal research and
4 analysis will supply additional facts and provide new and different meaning to known facts, and
5 may establish new factual conclusions and legal contentions, all of which may result in additional
6 changes and/or variations from the responses set herein and Responding Party reserves the right
7 to supplement this response at a later time as appropriate, up to and including at trial.
8

9 **SPECIAL INTERROGATORY NO. 11**

10 State the date on which YOU first became aware that DEFENDANT submitted REPAIR
11 REQUESTS CONCERNING water intrusion at the PREMISES.

12 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 11**

13 As part of this meet and confer, Responding Party requests that Propounding Party define
14 the term “aware,” “water intrusion.” Subject to the foregoing objections, and without waiving
15 them, Responding Party responds as follows: On or about September 2024. Discovery is ongoing
16 and it is anticipated that additional discovery and further investigation, legal research and analysis
17 will supply additional facts and provide new and different meaning to known facts, and may
18 establish new factual conclusions and legal contentions, all of which may result in additional
19 changes and/or variations from the responses set herein and Responding Party reserves the right
20 to supplement this response at a later time as appropriate, up to and including at trial.
21

22 **SPECIAL INTERROGATORY NO. 12**

23 IDENTIFY all PERSONS who received or responded to DEFENDANT'S REPAIR
24 REQUESTS made between September 2024 and January 2025.

25 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 12**

26 As part of this meet and confer, Responding Party requests that Propounding Party define
27 the term “received,” “responded.” Subject to the foregoing objections, and without waiving them,
28 Responding Party responds as follows:

1 Responding Party exercises its right to produce writings under Code of Civil Procedure
2 Section 2030.210(a)(2). Responding Party, Vicki Martinez, Gail Houser, Richard Dean Houser,
3 all of whom can be contacted via Responding Party's Counsel of record. Discovery is ongoing and
4 it is anticipated that additional discovery and further investigation, legal research and analysis will
5 supply additional facts and provide new and different meaning to known facts, and may establish
6 new factual conclusions and legal contentions, all of which may result in additional changes and/or
7 variations from the responses set herein and Responding Party reserves the right to supplement
8 this response at a later time as appropriate, up to and including at trial.

9
10 **SPECIAL INTERROGATORY NO. 13**

11 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
12 had submitted a COMPLAINT to the California Civil Rights Department CONCERNING the
13 PREMISES.

14 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 13**

15 As part of this meet and confer, Responding Party requests that Propounding Party define
16 the term "aware," "served," "submitted." Subject to the foregoing objections, and without waiving
17 them, Responding Party responds as follows:

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

25
26 **SPECIAL INTERROGATORY NO. 14**

27 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
28 had submitted a COMPLAINT to the Los Angeles County Department of Public Health
CONCERNING the PREMISES.