

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;  
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