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

13	BRADFORD M. MARTINEZ; VICKI L.	)	CASE NO. 25PDUD00999
14	MARTINEZ; GAIL DIANE CALHOUN	)	
15	AKA GAIL DIANE HOUSER	)	[Assigned for all purposes to the Hon.
16		)	Jerry B. Marshak, Dept. R]
17	Plaintiffs,	)	
18		)	
19	v.	)	<b>PLAINTIFF'S SUPPLEMENTAL</b>
20		)	<b>RESPONSE TO REQUEST FOR</b>
21	JENNIFER BURBANK; JAMES	)	<b>ADMISSIONS</b>
22	BURBANK	)	
23		)	Complaint Filed: April 1, 2025
24	Defendants,	)	
25		)	Trial Date: June 12, 2025
26		)	

27 PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

28 RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

SET NO.: One

BRADFORD M. MARTINEZ ("Responding Party") hereby provides its supplemental responses to JENNIFER BURBANK'S ("Propounding Party") Requests for Admission (Set One) as follows:

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

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

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

## PLAINTIFF'S SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSIONS - 2

1 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks the  
2 disclosure of information that is neither relevant to the subject matter of the action nor reasonably  
3 calculated to lead to the discovery of admissible evidence.

4  
5 B. CONFIDENTIALITY/PRIVACY OBJECTION

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

9  
10 C. OVERBREADTH AND BURDEN OBJECTION

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

21 D. AMBIGUITY OBJECTION

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

26 E. AVAILABILITY OBJECTION

27 Responding Party objects on the basis that the interrogatory is equally accessible to all parties  
28 or is more accessible to the Propounding Party or which is maintained primarily by persons or

1 entities other than Responding Party.

2 F. IMPROPER FORM OBJECTION

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

7 G. LEGAL CONCLUSION OBJECTION

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

9 H. ATTORNEY WORK-PRODUCT OBJECTION

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

12 I. MARITAL PRIVILEGE OBJECTION

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

15 **REQUEST FOR ADMISSION NO. 2:**

16 Admit that prior to June 2024, PLAINTIFF had not informed DEFENDANT of any intent  
17 to recover possession of the PREMISES.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 2**

19 As part of this meet and confer process, Responding Party requests that Propounding  
20 Party define the term “recover possession.” Notwithstanding and without waiving the foregoing  
21 objections, Responding Party responds as follows:

22 Admit. Discovery is ongoing and it is anticipated that additional discovery and further  
23 investigation, legal research and analysis will supply additional facts and provide new and different  
24 meaning to known facts, and may establish new factual conclusions and legal contentions, all of  
25 which may result in additional changes and/or variations from the responses set herein and  
26 Responding Party reserves the right to supplement this response at a later time as appropriate, up  
27 to and including at trial.  
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1 **REQUEST FOR ADMISSION NO. 3:**

2 Admit that on or about June 19, 2024, PLAINTIFF served DEFENDANT with a notice of  
3 non-renewal of the RENTAL AGREEMENT.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 3**

5  
6 As part of this meet and confer process, Responding Party requests that Propounding Party  
7 define the term “served,” “notice of non-renewal.” Notwithstanding and without waiving the  
8 foregoing objections, Responding Party responds as follows:

9 Admit, to the extent indicated in the e-mail bearing the subject “Lease Termination of 518  
10 N. Stoneman Ave. Alhambra CA 91801” which is attached hereto or sent concurrently with these  
11 supplemental responses. Discovery is ongoing and it is anticipated that additional discovery and  
12 further 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 contentions,  
14 all of which may result in additional changes and/or variations from the responses set herein and  
15 Responding Party reserves the right to supplement this response at a later time as appropriate, up  
16 to and including at trial.

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18  
19 **REQUEST FOR ADMISSION NO. 4:**

20 Admit that the June 19, 2024 notice of non-renewal stated that DEFENDANT had violated  
21 the RENTAL AGREEMENT by allegedly modifying bathroom and keeping a pet.

22 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 4**

23  
24 As part of this meet and confer process, Responding Party requests that Propounding Party  
25 define the term “notice of non-renewal,” “modifying bathroom,” “pet.” Notwithstanding and  
26 without waiving the foregoing objections, Responding Party responds as follows:  
27  
28

1 See Supplemental Response to Request for Admission No. 3. Deny, to the extent that the  
2 e-mail bearing the subject "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801"  
3 does not reference "modifying bathroom." Admit, to the extent that the e-mail bearing the subject  
4 "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801" references "pet." Discovery  
5 is ongoing and it is anticipated that additional discovery and further investigation, legal research  
6 and analysis will supply additional facts and provide new and different meaning to known facts,  
7 and may establish new factual conclusions and legal contentions, all of which may result in  
8 additional changes and/or variations from the responses set herein and Responding Party reserves  
9 the right to supplement this response at a later time as appropriate, up to and including at trial.  
10  
11

12 **REQUEST FOR ADMISSION NO. 5:**

13 Admit that the June 19, 2024 notice of non-renewal did not state that PLAINTIFF or  
14 PLAINTIFF's relative intended to move into the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 5**

16  
17 As part of this meet and confer process, Responding Party requests that Propounding Party  
18 define the term "notice of non-renewal," "relative." Notwithstanding and without waiving the  
19 foregoing objections, Responding Party responds as follows:

20 See Supplemental Response to Request for Admission Nos. 3-4. Admit, to the extent that  
21 the e-mail bearing the subject "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801"  
22 does not reference "relative." Discovery is ongoing and it is anticipated that additional discovery  
23 and further investigation, legal research and analysis will supply additional facts and provide new  
24 and different meaning to known facts, and may establish new factual conclusions and legal  
25 contentions, all of which may result in additional changes and/or variations from the responses set  
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1 herein and Responding Party reserves the right to supplement this response at a later time as  
2 appropriate, up to and including at trial.

3 **REQUEST FOR ADMISSION NO. 6:**

4 Admit that the NOTICE served on or about January 30, 2025, was the first written  
5 communication to DEFENDANT stating that Robert L. Fernandez intended to occupy the  
6 PREMISES.  
7

8 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 6**

9 As part of this meet and confer process, Responding Party requests that Propounding Party  
10 provide a copy of the referenced NOTICE. Notwithstanding and without waiving the foregoing  
11 objections, Responding Party responds as follows:  
12

13 Responding Party made a reasonable inquiry and the information it knows or can readily  
14 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
15 additional discovery and further investigation, legal research and analysis will supply additional  
16 facts and provide new and different meaning to known facts, and may establish new factual  
17 conclusions and legal contentions, all of which may result in additional changes and/or variations  
18 from the responses set herein and Responding Party reserves the right to supplement this response  
19 at a later time as appropriate, up to and including at trial.  
20

21 **REQUEST FOR ADMISSION NO. 7**

22 Admit that DEFENDANT submitted written REPAIR REQUESTS to PLAINTIFF or the  
23 PROPERTY MANAGER in September 2024 concerning water intrusion at the PREMISES.  
24

25 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 7**

26 As part of this meet and confer process, Responding Party requests that Propounding Party  
27 define the term “written,” “concerning,” “water intrusion.” Given that this request is compound,  
28

1 Responding Party requests that Propounding Party separate this request into distinct questions.  
2 Notwithstanding and without waiving the foregoing objections, Responding Party responds as  
3 follows:

4         Responding Party made a reasonable inquiry and the information it knows or can readily  
5 obtain is insufficient to enable it to admit or deny with respect to the PROPERTY MANAGER.  
6 Deny, with respect to the PLAINTIFF. Discovery is ongoing and it is anticipated that additional  
7 discovery and further investigation, legal research and analysis will supply additional facts and  
8 provide new and different meaning to known facts, and may establish new factual conclusions and  
9 legal contentions, all of which may result in additional changes and/or variations from the  
10 responses set herein and Responding Party reserves the right to supplement this response at a later  
11 time as appropriate, up to and including at trial.

12 **REQUEST FOR ADMISSION NO. 8:**

13         Admit that DEFENDANT submitted additional REPAIR REQUESTS between December  
14 2024 and January 2025 concerning unresolved issues at the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 8**

16         As part of this meet and confer process, Responding Party requests that Propounding Party  
17 define the term “additional,” “concerning,” “unresolved issues.” Notwithstanding and without  
18 waiving the foregoing objections, Responding Party responds as follows:

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

3 **REQUEST FOR ADMISSION NO. 9:**

4 Admit that PLAINTIFF did not complete REPAIRS to address water intrusion at the  
5 PREMISES before serving the NOTICE.  
6

7 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 9**

8 As part of this meet and confer process, Responding Party requests that Propounding Party  
9 define the term “complete,” “water intrusion.” Notwithstanding and without waiving the foregoing  
10 objections, Responding Party responds as follows:  
11

12 To the extent Responding Party indicated in the documents attached hereto or sent  
13 concurrently with these supplemental responses, Admit. Responding Party made a reasonable  
14 inquiry and the information it knows or can readily obtain is insufficient to enable it to admit or  
15 deny. Discovery is ongoing and it is anticipated that additional discovery and further investigation,  
16 legal research and analysis will supply additional facts and provide new and different meaning to  
17 known facts, and may establish new factual conclusions and legal contentions, all of which may  
18 result in additional changes and/or variations from the responses set herein and Responding Party  
19 reserves the right to supplement this response at a later time as appropriate, up to and including at  
20 trial.  
21

22 **REQUEST FOR ADMISSION NO. 10:**

23 Admit that DEFENDANT submitted a COMPLAINT to the California Civil Rights  
24 Department in or about September 2024 regarding the condition of the PREMISES.  
25

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1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 10**

2 As part of this meet and confer process, Responding Party requests that Propounding Party  
3 define the term “submitted,” “regarding,” “condition.” Notwithstanding and without waiving the  
4 foregoing objections, Responding Party responds as follows:  
5

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

13 **REQUEST FOR ADMISSION NO. 11:**

14 Admit that DEFENDANT submitted a COMPLAINT to the Los Angeles County  
15 Department of Public Health in or about October 2024 regarding the condition of the PREMISES.  
16

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 11**

18 As part of this meet and confer process, Responding Party requests that Propounding Party  
19 define the term “submitted “regarding,” “condition.” Notwithstanding and without waiving the  
20 foregoing objections, Responding Party responds as follows:  
21

22 Deny. Discovery is ongoing and it is anticipated that additional discovery and further  
23 investigation, legal research and analysis will supply additional facts and provide new and different  
24 meaning to known facts, and may establish new factual conclusions and legal contentions, all of  
25 which may result in additional changes and/or variations from the responses set herein and  
26 Responding Party reserves the right to supplement this response at a later time as appropriate, up  
27 to and including at trial.  
28

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that DEFENDANT followed up in writing with PLAINTIFF regarding REPAIRS  
3 to the PREMISES on or about January 28, 2025.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 12**

5  
6 As part of this meet and confer process, Responding Party requests that Propounding Party  
7 define the term “writing,” “regarding.” Notwithstanding and without waiving the foregoing  
8 objections, Responding Party responds as follows:

9 Admit. Discovery is ongoing and it is anticipated that additional discovery and further  
10 investigation, legal research and analysis will supply additional facts and provide new and different  
11 meaning to known facts, and may establish new factual conclusions and legal contentions, all of  
12 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  
16 **REQUEST FOR ADMISSION NO. 13:**

17  
18 Admit that PLAINTIFF served the NOTICE within three days after DEFENDANT's  
19 January 2025 follow-up communication requesting REPAIRS.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 13**

21 As part of this meet and confer process, Responding Party requests that Propounding Party  
22 define the term “follow-up communication,” “requesting.” Responding Party requests that  
23 Propounding Party specify which “DEFENDANT's January 2025 follow-up communication  
24 requesting REPAIRS” is being referred to. Notwithstanding and without waiving the foregoing  
25 objections, Responding Party responds as follows:  
26  
27  
28

1 Responding Party made a reasonable inquiry and the information it knows or can readily  
2 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
3 additional discovery and further investigation, legal research and analysis will supply additional  
4 facts and provide new and different meaning to known facts, and may establish new factual  
5 conclusions and legal contentions, all of which may result in additional changes and/or variations  
6 from the responses set herein and Responding Party reserves the right to supplement this response  
7 at a later time as appropriate, up to and including at trial.  
8

9 **REQUEST FOR ADMISSION NO. 14:**

10 Admit that DEFENDANT's habitability-related COMPLAINTS and REPAIR REQUESTS  
11 constitute PROTECTED ACTIVITY under California law.  
12

13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 14**

14 As part of this meet and confer process, Responding Party requests that Propounding Party  
15 define the term "habitability-related," "California law." Given that this request is compound,  
16 Responding Party requests that Propounding Party separate this request into distinct questions.  
17 Notwithstanding and without waiving the foregoing objections, Responding Party responds as  
18 follows:  
19

20 Responding Party made a reasonable inquiry and the information it knows or can readily  
21 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
22 additional discovery and further investigation, legal research and analysis will supply additional  
23 facts and provide new and different meaning to known facts, and may establish new factual  
24 conclusions and legal contentions, all of which may result in additional changes and/or variations  
25 from the responses set herein and Responding Party reserves the right to supplement this response  
26 at a later time as appropriate, up to and including at trial.  
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1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the  
3 California Civil Rights Department before serving the NOTICE.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 15**

5  
6 As part of this meet and confer process, Responding Party requests that Propounding Party  
7 define the term “knowledge.” Responding Party also requests that Propounding Party define the  
8 term “COMPLAINT,” as there appear to be inconsistencies in how the term is defined by  
9 Propounding Party but used in this request. Notwithstanding and without waiving the foregoing  
10 objections, Responding Party responds as follows:

11  
12 Responding Party made a reasonable inquiry and the information it knows or can readily  
13 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
14 additional discovery and further investigation, legal research and analysis will supply additional  
15 facts and provide new and different meaning to known facts, and may establish new factual  
16 conclusions and legal contentions, all of which may result in additional changes and/or variations  
17 from the responses set herein and Responding Party reserves the right to supplement this response  
18 at a later time as appropriate, up to and including at trial.

19  
20 **REQUEST FOR ADMISSION NO. 16:**

21 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the  
22 Los Angeles County Department of Public Health before serving the NOTICE.

23 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 16**

24  
25 As part of this meet and confer process, Responding Party requests that Propounding Party  
26 define the term “knowledge.” Responding Party also requests that Propounding Party define the  
27 term “COMPLAINT,” as there appear to be inconsistencies in how the term is defined by  
28

1 Propounding Party but used in this request. Notwithstanding and without waiving the foregoing  
2 objections, Responding Party responds as follows:

3         Responding Party made a reasonable inquiry and the information it knows or can readily  
4 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
5 additional discovery and further investigation, legal research and analysis will supply additional  
6 facts and provide new and different meaning to known facts, and may establish new factual  
7 conclusions and legal contentions, all of which may result in additional changes and/or variations  
8 from the responses set herein and Responding Party reserves the right to supplement this response  
9 at a later time as appropriate, up to and including at trial.  
10

11  
12 **REQUEST FOR ADMISSION NO. 17:**

13         Admit that no DOCUMENT served by PLAINTIFF prior to January 30, 2025, referenced  
14 any intention by Robert L. Fernandez to move into the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 17**

16         Admit.  
17

18 **REQUEST FOR ADMISSION NO. 18:**

19         Admit that the reasons given in the June 2024 non renewal notice are different from the  
20 reasons given in the January 2025 NOTICE.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 18**

22         As part of this meet and confer process, Responding Party requests that Propounding Party  
23 define the term “reasons,” “non-renewal notice.” Responding Party requests that Propounding  
24 Party specify which “June 2024 non renewal notice” and “January 2025 NOTICE” are being  
25 referred to. Notwithstanding and without waiving the foregoing objections, Responding Party  
26 responds as follows:  
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1 Responding Party made a reasonable inquiry and the information it knows or can readily  
2 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
3 additional discovery and further investigation, legal research and analysis will supply additional  
4 facts and provide new and different meaning to known facts, and may establish new factual  
5 conclusions and legal contentions, all of which may result in additional changes and/or variations  
6 from the responses set herein and Responding Party reserves the right to supplement this response  
7 at a later time as appropriate, up to and including at trial.

8  
9 **REQUEST FOR ADMISSION NO. 19:**

10 Admit that DEFENDANT was in possession of the PREMISES for more than three years  
11 before the NOTICE was served.

12  
13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 19**

14 Deny.

15 **REQUEST FOR ADMISSION NO. 20:**

16 Admit that PLAINTIFF has not produced any DOCUMENT confirming a scheduled  
17 move-in date for Robert L. Fernandez.

18  
19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 20**

20 As part of this meet and confer process, Responding Party requests that Propounding Party  
21 define the term “produced,” “confirming.” Responding Party also requests, that Propounding Party  
22 specify whom this request concerns with respect to referenced production and who requested any  
23 referenced production. Notwithstanding and without waiving the foregoing objections,  
24 Responding Party responds as follows:

25  
26 Responding Party made a reasonable inquiry and the information it knows or can readily  
27 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that  
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1 additional discovery and further investigation, legal research and analysis will supply additional  
2 facts and provide new and different meaning to known facts, and may establish new factual  
3 conclusions and legal contentions, all of which may result in additional changes and/or variations  
4 from the responses set herein and Responding Party reserves the right to supplement this response  
5 at a later time as appropriate, up to and including at trial.  
6

7 **REQUEST FOR ADMISSION NO. 22**

8 Admit that Robert L. Fernandez is currently residing in a full-time assisted living facility.

9 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 22**

10 As part of this meet and confer process, Responding Party requests that Propounding Party  
11 define the term “assisted living facility.” Notwithstanding and without waiving the foregoing  
12 objections, Responding Party responds as follows: Deny.  
13

14 DATED: 6/6/2025

MARINACCIO LAW

15  
16 BY: Anthony Marinaccio  
17

18 Anthony Marinaccio, Esq.  
19 Attorney for Plaintiffs,  
20 Bradford M. Martinez, Vicki L. Martinez, and  
21 Gail Diane Calhoun AKA Gail Diane Houser  
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1 **VERIFICATION**

2

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4

5 I HAVE read the following Supplemental Response to Request for Admission and know  
6 its contents.

7 I am a party to the action. The matters stated in the foregoing document are true of my  
8 own knowledge except as to those matters which are stated on information and belief, and as to  
those matters I believe them to be true.

9 Executed on 06/06/2025 in Alhambra, California.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
11 true and correct.

12

13 Type or Print Name: Bradford M. Martinez

14 Signature Bradford Martinez

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