

1 **REQUEST NO. 9**

2 All DOCUMENTS reflecting any COMPLAINT, criticism, or statement made by  
3 PLAINTIFF or PROPERTY MANAGER CONCERNING DEFENDANT'S habitability  
4 COMPLAINTS or REPAIR REQUESTS.  
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6 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 9**

7 As part of this meet and confer process, Responding Party requests that Propounding Party  
8 define the term "criticism," "statement," "habitability." Because this request is compound,  
9 Responding Party requests that Propounding Party separate this request into distinct asks.  
10 Additionally, this request seeks confidential, private and/or privileged documents of third parties  
11 not part of the Action, the disclosure of which would violate their right to privacy. This request  
12 seeks information protected by disclosure by the attorney-client privilege and/or work-product  
13 doctrine and/or information prepared in anticipation of litigation, including physician-patient  
14 privilege. Notwithstanding and without waiving the foregoing objections, Responding Party  
15 responds as follows:  
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18 After a diligent search and a reasonable inquiry, Responding Party is unable to comply  
19 with this request because no such document exists or is no longer in possession of Responding  
20 Party. Discovery is ongoing and it is anticipated that additional discovery and further  
21 investigation, legal research and analysis will supply additional facts and provide new and  
22 different meaning to known facts, and may establish new factual conclusions and legal  
23 contentions, all of which may result in additional changes and/or variations from the responses  
24 set herein and Responding Party reserves the right to supplement this response at a later time as  
25 appropriate, up to and including at trial.  
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1 **REQUEST NO. 11**

2 All DOCUMENTS CONCERNING June 19, 2024 non-renewal notice served on  
3 DEFENDANT.

4 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 11**

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6 As part of this meet and confer process, Responding Party requests that Propounding  
7 Party define the term “non-renewal notice,” “served.” Additionally, this request seeks  
8 confidential, private and/or privileged documents of third parties not part of the Action, the  
9 disclosure of which would violate their right to privacy. This request seeks information protected  
10 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information  
11 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and  
12 without waiving the foregoing objections, Responding Party responds as follows:

14 Responding Party produces all relevant documents in Responding Party’s possession or  
15 control which are attached hereto or sent concurrently with these responses. Discovery is  
16 ongoing and it is anticipated that additional discovery and further investigation, legal research  
17 and analysis will supply additional facts and provide new and different meaning to known facts,  
18 and may establish new factual conclusions and legal contentions, all of which may result in  
19 additional changes and/or variations from the responses set herein and Responding Party reserves  
20 the right to supplement this response at a later time as appropriate, up to and including at trial.

21 **REQUEST NO. 12**

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24 All DOCUMENTS reflecting any determination by PLAINTIFF that the PREMISES was  
25 needed for owner or relative occupancy prior to January 30, 2025.

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1 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 12**

2 As part of this meet and confer process, Responding Party requests that Propounding  
3 Party define the term “reflecting,” “any determination,” “owner,” “relative.” Because this request  
4 is compound, Responding Party requests that Propounding Party separate this request into  
5 distinct asks. Notwithstanding and without waiving the foregoing objections, Responding Party  
6 responds as follows:  
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8 After a diligent search and a reasonable inquiry, Responding Party is unable to comply  
9 with this request as propounded. Discovery is ongoing and it is anticipated that additional  
10 discovery and further investigation, legal research and analysis will supply additional facts and  
11 provide new and different meaning to known facts, and may establish new factual conclusions  
12 and legal contentions, all of which may result in additional changes and/or variations from the  
13 responses set herein and Responding Party reserves the right to supplement this response at a  
14 later time as appropriate, up to and including at trial.  
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16 **REQUEST NO. 13**

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18 All DOCUMENTS CONCERNING PLAINTIFF'S compliance or claimed exemption  
19 from the Tenant Protection Act (Civil Code§ 1946.2) in relation to this TENANCY.  
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21 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 13**

22 As part of this meet and confer process, Responding Party requests that Propounding Party  
23 define the term “compliance,” “claimed exemption.” Because this request is compound,  
24 Responding Party requests that Propounding Party separate this request into distinct asks.  
25 Responding Party requests that Propounding Party specify which sections and corresponding  
26 subparts of the various Civil Code Sections cited by Propounding Party (Civil Code sections  
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1 1946.2) this request concerns. Notwithstanding and without waiving the foregoing objections,  
2 Responding Party responds as follows:

3       After a diligent search and a reasonable inquiry, Responding Party is unable to comply  
4 with this request as propounded. 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  
7 and 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  
9 later time as appropriate, up to and including at trial.  
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12 **REQUEST NO. 14**

13       All DOCUMENTS CONCERNING any COMMUNICATIONS between PLAINTIFF and  
14 any government agency regarding DEFENDANT or the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 14**

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17       As part of this meet and confer process, Responding Party requests that Propounding Party  
18 define the term “government agency.” Because this request is compound, Responding Party  
19 requests that Propounding Party separate this request into distinct asks. Notwithstanding and  
20 without waiving the foregoing objections, Responding Party responds as follows:

21       Responding Party produces all relevant documents in Responding Party’s possession or  
22 control which are attached hereto or sent concurrently with these responses. Discovery is  
23 ongoing and it is anticipated that additional discovery and further investigation, legal research  
24 and analysis will supply additional facts and provide new and different meaning to known facts,  
25 and may establish new factual conclusions and legal contentions, all of which may result in  
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1 additional changes and/or variations from the responses set herein and Responding Party reserves  
2 the right to supplement this response at a later time as appropriate, up to and including at trial.

3 **REQUEST NO. 15**

4 All DOCUMENTS submitted to or received from the any government entity  
5 CONCERNING DEFENDANT'S TENANCY.

7 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 15**

8 As part of this meet and confer process, Responding Party requests that Propounding Party  
9 define the term “government entity.” Responding Party requests that Propounding Party specify  
10 whom the party “submitt[ing]” the DOCUMENTS this request concerns. Notwithstanding and  
11 without waiving the foregoing objections, Responding Party responds as follows:

13 After a diligent search and a reasonable inquiry, Responding Party is unable to comply  
14 with this request as propounded. 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.

21 **REQUEST NO. 16**

23 All DOCUMENTS that PLAINTIFF intends to rely on at trial in this CASE.

24 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 16**

25 After a review of the Meet and Confer letter dated June 2, 2025 from Defendant’s  
26 Counsel, which in relevant part states that “Plaintiff vaguely promises to produce ‘non-privileged  
27 documents, if any,” Responding Party is unaware of any said response to Request for Production  
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