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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**
14

15 BRADFORD M. MARTINEZ, VICKI L.
16 MARTINEZ, AND GAIL DIANE CALHOUN
17 AKA GAIL DIANE HOUSER,

18 Plaintiffs,

19 vs

20 JENNIFER BURBANK AND JAMES
21 BURBANK,

22 Defendants.

Case No. 25PDUD00999

[Assigned for All Purposes to the Hon. Jerry
B. Marshak, Dept. R]

**PLAINTIFF'S REQUEST FOR
PRODUCTION TO DEFENDANT
JENNIFER BURBANK (SET NO. 1)**

PROPOUNDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

RESPONDING PARTY: DEFENDANT, JENNIFER BURBANK

SET NO: One

Pursuant to *Code of Civil Procedure* § 2031.010 et seq., PLAINTIFF, BRADFORD
MARTINEZ, propounds the following Requests for Production of Documents (Set One) on
DEFENDANT, JENNIFER BURBANK ("Defendant" or "Responding Party"), and requests that
Plaintiff answer each such request in writing, separately, and under oath, five (5) days from the
date hereof, in the manner specified in said statute, and product responsive documents.

1 **PLEASE TAKE FURTHER NOTICE** that § 2031.210 and § 2031.220 of the Code of
2 Civil Procedure requires a written response, in compliance with said sections.

3 The DOCUMENTS and tangible things for which inspection is demanded are believed to
4 be currently in the possession of said party, not privileged, are relevant to the subject matter of
5 this action and are reasonably calculated to lead to the discovery of admissible evidence.

6 If any document covered by this Demand is withheld by reason of a claim of privilege, a
7 list is to be furnished at the time that a written response is served identifying any such
8 DOCUMENTS for which the privilege is claimed together with the following information with
9 respect to any document withheld:

- 10 a. author;
- 11 b. recipient;
- 12 c. sender;
- 13 d. indicated or blind copies;
- 14 e. date;
- 15 f. general subject matter;
- 16 g. basis on which the privilege is claimed; and
- 17 h. the category of DOCUMENTS of this Demand to which such document relates.

18 In the event that any DOCUMENT called for by this Demand has been destroyed, lost,
19 discarded or otherwise disposed of, any such document is to be identified as completely as
20 possible, including without limitation the following information:

- 21 a. date of disposal;
- 22 b. manner of disposal;
- 23 c. reason for disposal;
- 24 d. person authorizing disposal; and
- 25 e. person disposing of document.

26 In responding to this Demand, the responding party is required to produce all requested
27 DOCUMENTS, whether prepared by or for the responding party, or by or for any other person or
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1 entity, which are in the possession, custody, or control of the responding party or its agents and
2 representatives.

3 **DEFINITIONS AND INSTRUCTIONS**

- 4 1. The word “DOCUMENT” and “DOCUMENTS” shall mean any and all “writings,” as
5 the term is defined in California Evidence Code Section 250 and California Code of Civil
6 Procedure Section 2031.010, including, but not limited to any tangible items which
7 contain handwriting, typewriting, printing, photostatic reproduction, photographic
8 reproduction, electronic reproduction, and any other form of communications or
9 representations whether produced, reproduced, or stored on paper, cards, tapes, discs,
10 belts, charts, films (including microfilm or microfiche), computer storage devices or any
11 other medium or recordation that are in YOUR possession, custody or control, or the
12 possession, custody, or control of any of YOUR agents, attorneys, accountants, or
13 representatives.
- 14 2. As used in this request for production of DOCUMENTS, every non-identical copy (i.e.,
15 any DOCUMENT which is no longer identical by virtue of any notation or modification
16 of any kind, including, without limiting the generality of the foregoing, notes or
17 modifications on the backs or margins of pages thereof or on copies thereof or by virtue
18 of the attachments thereto) of a “DOCUMENT,” must be produced in response to this
19 request.
- 20 3. All designated “DOCUMENTS” are to be taken as including all attachments and
21 enclosures.
- 22 4. “DOCUMENTS” produced pursuant to this request must be segregated according to the
23 paragraphs of this request to which they are responsive. It will not be necessary to
24 submit duplicate copies of DOCUMENTS which are responsive to more than one
25 paragraph of this request if the paragraphs of this request to which they relate are
26 designated.
- 27 5. The terms “CONCERNING” and “REGARDING” means relating to, referring to,
28 describing, evidencing, or constituting.

- 1 6. The word “YOU,” “YOUR” “YOURS,” and “YOURSELF” shall each refer to
2 Defendant, JENNIFER BURBANK, including JENNIFER BURBANK’s past and
3 present agents, representatives, assigns, and anyone directing JENNIFER BURBANK’s
4 actions in the present matter bearing case number 25PDUD00999 (“ACTION”).
- 5 7. The phrase “PROPOUNDING PARTY” shall mean Plaintiff, BRADFORD MARTINEZ,
6 and shall include any of BRADFORD MARTINEZ’s representatives, employees, agents,
7 or assigns as well as any parties directing BRADFORD MARTINEZ’s actions in this
8 ACTION.
- 9 8. The word “COMMUNICATIONS” shall mean any document, oral statement, meeting or
10 conference, formal or informal, at any time or place and under any circumstances
11 whatsoever, whereby information of any nature was stated, written, recorded or in any
12 matter transmitted or transferred.
- 13 9. The word “LEASE” shall mean the Residential Lease or one year Rental Agreement,
14 bearing a commencement date of September 8, 2023 pursuant to which YOU occupy the
15 PREMISES. Attached hereto as Exhibit 1 is a true and correct copy of the LEASE.
- 16 10. The word “RENT” shall mean the amount of money due monthly from YOU in exchange
17 for which YOU are granted the right to occupy the PREMISES that are the subject of this
18 ACTION.
- 19 11. The term “PREMISES” shall mean the real property commonly known as 518 North
20 Stoneman Avenue, Alhambra CA 91801.
- 21 12. The term “REPAIRS” shall mean any work to correct, change, clean, ameliorate, or
22 otherwise fix the PREMISES.
- 23 13. The term “CONTACT INFORMATION” shall mean all contact information within the
24 Responding Party’s possession, custody, or control, including, but not limited to personal
25 phone numbers, business phone numbers, e-mail addresses, and mailing addresses.
- 26 14. The term “HABITABILITY” shall mean the physical condition of a residential living
27 space, including but not limited to, the condition of doors and walls, the accumulation of
28 mold, and infestation of vermin and rodents.

1 15. The term "HOUSING AUTHORITY" is defined as any municipal or county agency or
2 other government institution tasked with regulation and inspection of residential
3 properties, such as the County of Los Angeles or the Los Angeles Housing Community
4 Investment Department.

5 16. The word "PERSON" is defined consistent with California Evidence Code Section 175
6 and shall mean and include any natural person, corporation, partnership, sole
7 proprietorship, organization, association, federation, governmental entity or association,
8 or any other kind of entity.

9 17. The terms "all," "any," and "each" shall be construed as encompassing any and all.

10 18. The connectives "and" and "or" shall be construed either disjunctively or conjunctively
11 as necessary to bring within the scope of the discovery request all responses that might
12 otherwise be construed to be outside of its scope.

13 19. The use of the singular form of any word includes the plural and *vice versa*.

14 All definitions construed herein will retain their meaning irrespective of whether they are
15 capitalized in the requests below.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 1**

18 All DOCUMENTS that support YOUR contention in YOUR ANSWER that, "Plaintiff waived,
19 changed, or canceled the notice to quit."

20 **REQUEST FOR PRODUCTION NO. 2**

21 All COMMUNICATIONS that support YOUR contention in YOUR ANSWER that, "Plaintiff
22 waived, changed, or canceled the notice to quit."

23 **REQUEST FOR PRODUCTION NO. 3**

24 All DOCUMENTS that support YOUR contention that "Plaintiff served Defendant with the
25 notice to quit or filed the complaint to retaliate against Defendant."

26 **REQUEST FOR PRODUCTION NO. 4**

27 All COMMUNICATIONS that support YOUR contention that "Plaintiff served Defendant with
28 the notice to quit or filed the complaint to retaliate against Defendant."

REQUEST FOR PRODUCTION NO. 5

All DOCUMENTS that support YOUR contention that “Plaintiff’s demand for possession violates the local rent control or eviction control ordinance of [...] Tenant Protection Ordinance of 2019.”

REQUEST FOR PRODUCTION NO. 6

All COMMUNICATIONS that support YOUR contention that “Plaintiff’s demand for possession violates the local rent control or eviction control ordinance of [...] Tenant Protection Ordinance of 2019.”

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS that support YOUR contention that “Plaintiff failed to state a just cause for termination of tenancy in the written notice to terminate.”

REQUEST FOR PRODUCTION NO. 8

All COMMUNICATIONS that support YOUR contention that “Plaintiff failed to state a just cause for termination of tenancy in the written notice to terminate.”

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS that support that support YOUR contention that Plaintiff failed to comply with the relocation assistance requirements of Civil Code section 1946.2(d).

REQUEST FOR PRODUCTION NO. 10

All COMMUNICATIONS that support YOUR contention that Plaintiff failed to comply with the relocation assistance requirements of Civil Code section 1946.2(d).

REQUEST FOR PRODUCTION NO. 11

All DOCUMENTS that support YOUR contention that, “Plaintiff violated the Tenant Protection Act in a manner that defeats the complaint.”

REQUEST FOR PRODUCTION NO. 12

All COMMUNICATIONS that support YOUR contention that, “Plaintiff violated the Tenant Protection Act in a manner that defeats the complaint.”

REQUEST FOR PRODUCTION NO. 13

1 All DOCUMENTS that support YOUR contention that, “Defendants submitted multiple
2 habitability-related complaints [...] including complaints about persistent water intrusion in the
3 garage area [...]”

4 **REQUEST FOR PRODUCTION NO. 14**

5 All COMMUNICATIONS that support YOUR contention that, “Defendants submitted multiple
6 habitability-related complaints [...] including complaints about persistent water intrusion in the
7 garage area [...]”

8 **REQUEST FOR PRODUCTION NO. 15**

9 All DOCUMENTS that support YOUR contention that, “Defendants submitted multiple
10 habitability-related complaints [...] including complaints about persistent water intrusion in the
11 garage area [...] remains unresolved.”

12 **REQUEST FOR PRODUCTION NO. 16**

13 All COMMUNICATIONS that support YOUR contention that, “Defendants submitted multiple
14 habitability-related complaints [...] including complaints about persistent water intrusion in the
15 garage area [...] remains unresolved.”

16 **REQUEST FOR PRODUCTION NO. 17**

17 All DOCUMENTS that support YOUR response to the Form Interrogatories-General Set One.

18 **REQUEST FOR PRODUCTION NO. 18**

19 All COMMUNICATIONS that support YOUR response to the Form Interrogatories-General Set
20 One.

21 **REQUEST FOR PRODUCTION NO. 19**

22 All DOCUMENTS that support YOUR responses to the Requests for Admissions Set One.

23 **REQUEST FOR PRODUCTION NO. 20**

24 All COMMUNICATIONS that support YOUR responses to the Requests for Admissions Set
25 One.

26 **REQUEST FOR PRODUCTION NO. 21**

1 All DOCUMENTS CONCERNING any REPAIRS REGARDING the PREMISES that YOU
2 have performed, from the date YOU first occupied the PREMISES through the date of YOUR
3 response to these requests for production of documents – set one.

4 **REQUEST FOR PRODUCTION NO. 22**

5 All COMMUNICATIONS CONCERNING any REPAIRS REGARDING the PREMISES that
6 YOU have performed, from the date YOU first occupied the PREMISES through the date of
7 YOUR response to these requests for production of documents – set one.

8 **REQUEST FOR PRODUCTION NO. 23**

9 All DOCUMENTS CONCERNING any REPAIRS REGARDING the PREMISES that YOU
10 have requested from PROPOUNDING PARTY, from the date YOU first occupied the
11 PREMISES through the date of YOUR response to these requests for production of documents –
12 set one.

13 **REQUEST FOR PRODUCTION NO. 24**

14 All COMMUNICATIONS CONCERNING any REPAIRS REGARDING the PREMISES that
15 YOU have requested from PROPOUNDING PARTY, from the date YOU first occupied the
16 PREMISES through the date of YOUR response to these requests for production of documents –
17 set one.

18 **REQUEST FOR PRODUCTION NO. 25**

19 All DOCUMENTS between YOU and PROPOUNDING PARTY, CONCERNING the
20 HABITABILITY of the PREMISES, from the date YOU first occupied the PREMISES through
21 the date of YOUR response to these requests for production of documents – set one.

22 **REQUEST FOR PRODUCTION NO. 26**

23 All COMMUNICATIONS between YOU and PROPOUNDING PARTY, CONCERNING the
24 HABITABILITY of the PREMISES, from the date YOU first occupied the PREMISES through
25 the date of YOUR response to these requests for production of documents – set one.

26 **REQUEST FOR PRODUCTION NO. 27**

27 All DOCUMENTS REGARDING any conditions in violation of state or local building
28 codes, housing codes, or health codes, conditions of dilapidation, or other conditions in need of

1 repair at the PREMISES at any time from the date YOU first occupied the PREMISES through
2 the date of YOUR response to these requests for production of documents – set one.

3 **REQUEST FOR PRODUCTION NO. 28**

4 All COMMUNICATIONS REGARDING any conditions in violation of state or local building
5 codes, housing codes, or health codes, conditions of dilapidation, or other conditions in need of
6 repair at the PREMISES at any time from the date YOU first occupied the PREMISES through
7 the date of YOUR response to these requests for production of documents – set one.

8 **REQUEST FOR PRODUCTION NO. 29**

9 All DOCUMENTS REGARDING the PREMISES between YOU and the HOUSING
10 AUTHORITY, from the date YOU first occupied the PREMISES through the date of YOUR
11 response to these requests for production of documents – set one.

12 **REQUEST FOR PRODUCTION NO. 30**

13 All COMMUNICATIONS REGARDING the PREMISES between YOU and the HOUSING
14 AUTHORITY, from the date YOU first occupied the PREMISES through the date of YOUR
15 response to these requests for production of documents – set one.

16 **REQUEST FOR PRODUCTION NO. 31**

17 All DOCUMENTS that support YOUR response to the Form Interrogatories-General Set
18 One, served concurrently herewith.

19 **REQUEST FOR PRODUCTION NO. 32**

20 All COMMUNICATIONS that support YOUR response to the Form Interrogatories-
21 General Set One, served concurrently herewith.

22 **REQUEST FOR PRODUCTION NO. 33**

23 All DOCUMENTS that support YOUR responses to the Requests for Admissions Set
24 One, served concurrently herewith.

25 **REQUEST FOR PRODUCTION NO. 34**

26 All COMMUNICATIONS that support YOUR responses to the Requests for Admissions
27 Set One, served concurrently herewith.

28 **REQUEST FOR PRODUCTION NO. 35**

1 All DOCUMENTS that IDENTIFY PERSONS that YOU will call as witnesses during
2 trial in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 36**

4 All exhibits you intend to introduce at trial in this ACTION.
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8 Dated: June 6, 2025

9 *Anthony Marinaccio*
10 ANTHONY MARINACCIO
11 Attorney for the Plaintiffs
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