

inalienable right of privacy under the California Constitution and disclosure would violate Responding Party and the third parties' right to privacy. Subject to the foregoing objections, and without waiving them, Responding Party responds as follows:

Responding Party exercises its right to produce writings under Code of Civil Procedure Section 2030.210(a)(2). 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. 13

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

RESPONSE TO SPECIAL INTERROGATORY NO. 13

Responding Party objects to this request on the grounds that it is vague and ambiguous regarding the term "aware," "served," "submitted." This interrogatory is overbroad, vague, unduly burdensome, and oppressive in scope and time. Subject to the foregoing objections, and without waiving them, Responding Party responds as follows:

After a diligent search and a reasonable inquiry, Responding Party is unable to comply with this request as propounded, because Responding Party lacks knowledge of actions taken by Propounding Party at the time the NOTICE was served. 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.

1
2 **SPECIAL INTERROGATORY NO. 14**

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

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 14**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous
8 regarding the term “aware,” “served,” “submitted.” This interrogatory is overbroad, vague, unduly
9 burdensome, and oppressive in scope and time. Subject to the foregoing objections, and without
10 waiving them, Responding Party responds as follows:

11 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
12 with this request as propounded, because Responding Party lacks knowledge of actions taken by
13 Propounding Party at the time the NOTICE was served. Discovery is ongoing and it is
14 anticipated that additional discovery and further investigation, legal research and analysis will
15 supply additional facts and provide new and different meaning to known facts, and may establish
16 new factual conclusions and legal contentions, all of which may result in additional changes
17 and/or variations from the responses set herein and Responding Party reserves the right to
18 supplement this response at a later time as appropriate, up to and including at trial.

19 **SPECIAL INTERROGATORY NO. 15**

20 State all reasons why YOU served the NOTICE on or about January 30, 2025.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 15**

22 Responding Party objects to this request on the grounds that it is vague and ambiguous
23 regarding the term “aware,” “served,” “submitted.” This interrogatory is overbroad, vague, unduly
24 burdensome, and oppressive in scope and time. It is also duplicative of other discovery requests.
25 Subject to the foregoing objections, and without waiving them, Responding Party responds as
26 follows:

27 Responding Party exercises its right to produce writings under Code of Civil Procedure
28 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and

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

6 **SPECIAL INTERROGATORY NO. 16**

7 State all the reasons you gave DEFENDANT's for wanting them to vacate premises prior
8 to serving them with the NOTICE.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 16**

9 Responding Party objects in that this request seeks information equally available to
10 Propounding Party and is already within the Propounding Party's possession thereby making the
11 request overly burdensome, oppressive, and harassing. This interrogatory is overbroad, vague,
12 unduly burdensome, and oppressive in scope and time. This interrogatory calls for a legal
13 conclusion. Responding Party also objects to this request to the extent that it seeks information
14 protected from disclosure by the attorney-client privilege and attorney work product doctrine
15 and/or premature disclosure of expert witness information in violation of *Code of Civil Procedure*
16 §§ 2018 and 2034. In addition, Responding Party also objects to this request on the grounds that
17 it seeks information that impairs a person's inalienable right of privacy under the California
18 Constitution and disclosure would violate Responding Party and the third parties' right to privacy.
19 Subject to the foregoing objections, and without waiving them, Responding Party responds as
20 follows:

21 After a diligent search and a reasonable inquiry, Responding Party is unable to comply with
22 this request as propounded. As phrased, request is incomprehensible leaving Responding Party
23 unable to determine what is being requested. Discovery is ongoing and it is anticipated that
24 additional discovery and further investigation, legal research and analysis will supply additional
25 facts and provide new and different meaning to known facts, and may establish new factual
26 conclusions and legal contentions, all of which may result in additional changes and/or variations

1 from the responses set herein and Responding Party reserves the right to supplement this response
2 at a later time as appropriate, up to and including at trial.

3 **SPECIAL INTERROGATORY NO. 17**

4 Describe in detail how YOU and any PERSON acting on YOUR behalf responded to
5 DEFENDANT'S REPAIR REQUESTS made between September 2024 and January 2025.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 17**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous
8 regarding the term "describe in detail." Responding Party objects to this request on the grounds
9 that it is compound, overbroad, vague, unduly burdensome, and oppressive in scope and time.
10 Responding Party objects to this request on the grounds that it seeks information protected from
11 disclosure by the attorney-client privilege and attorney work product doctrine and/or premature
12 disclosure of expert witness information in violation of *Code of Civil Procedure* §§ 2018 and 2034.
13 In addition, Responding Party also objects to this request on the grounds that it seeks information
14 that impairs a person's inalienable right of privacy under the California Constitution and disclosure
15 would violate Responding Party and the third parties' right to privacy. Subject to the foregoing
16 objections, and without waiving them, Responding Party responds as follows:

17 Responding Party exercises its right to produce writings under Code of Civil Procedure
18 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
19 further investigation, legal research and analysis will supply additional facts and provide new and
20 different meaning to known facts, and may establish new factual conclusions and legal contentions,
21 all of which may result in additional changes and/or variations from the responses set herein and
22 Responding Party reserves the right to supplement this response at a later time as appropriate, up
23 to and including at trial.

20 **SPECIAL INTERROGATORY NO. 18**

21 IDENTIFY all DOCUMENTS referencing or CONCERNING communications between
22 PLAINTIFF and DEFENDANT between January 1, 2025, and January 30, 2025.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 18**

1 Responding Party objects to this request on the grounds that it is overbroad, vague, unduly
2 burdensome, and oppressive in scope and time. Responding Party objects to this request on the
3 grounds that it seeks information protected from disclosure by the attorney-client privilege and
4 attorney work product doctrine and/or premature disclosure of expert witness information in
5 violation of *Code of Civil Procedure* §§ 2018 and 2034. In addition, Responding Party also objects
6 to this request on the grounds that it seeks information that impairs a person's inalienable right of
7 privacy under the California Constitution and disclosure would violate Responding Party and the
8 third parties' right to privacy. Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

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

15 **SPECIAL INTERROGATORY NO. 19**

16 State whether YOU believe DEFENDANT'S REPAIR REQUESTS and COMPLAINTS
to government agencies were PROTECTED ACTIVITY under California law.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 19**

18 Responding Party objects to this request on the grounds that it is vague and ambiguous
19 regarding the term "government agencies," "California law." Responding Party objects in that this
20 request seeks information equally available to Propounding Party and is already within the
21 Propounding Party's possession thereby making the request overly burdensome, oppressive, and
22 harassing. This interrogatory is overbroad, vague, unduly burdensome, and oppressive in scope
and time. This interrogatory calls for a legal conclusion. Responding Party also objects to this
23 request to the extent that it seeks information protected from disclosure by the attorney-client