

Attorney for Plaintiffs,
Bradford M. Martinez; Vicki L. Martinez; Gail Diane Calhoun aka
Gail Diane Houser

BRADFORD M. MARTINEZ; VICKI L.)	CASE NO. 25PDUD00999
MARTINEZ; GAIL DIANE CALHOUN)	
AKA GAIL DIANE HOUSER)	[Assigned for all purposes to the Hon.
)	Jerry B. Marshak, Dept. R]
Plaintiffs,)	
)	
v.)	PLAINTIFF’S RESPONSES TO
)	REQUESTS FOR FORM
JENNIFER BURBANK; JAMES)	INTERROGATORIES-GENERAL
BURBANK)	SET ONE
)	
Defendants,)	Complaint Filed: April 1, 2025
)	
)	Trial Date: June 3, 2025

SET NO.: One

1 BRADFORD M. MARTINEZ (“Responding Party”) hereby provides its response to
2 JENNIFER BURBANK’S (“Propounding Party”) Form Interrogatories-General (Set One) as
3 follows:

4 **PRELIMINARY STATEMENT**

5 These responses are made only for the purpose of the within action. Each response or
6 answer is subject to all objections as to competence, relevance, materiality, propriety,
7 admissibility and any other objections and grounds that would require the exclusion of any
8 statement herein if any document was asked of, or if any statement contained therein were made
9 by a witness present and testifying in court, all of which objections and grounds are reserved and
10 may be interposed at the time of trial.

11 Plaintiff is responding to all Requests to the extent that information has become known
12 by him. However, this responding party’s discovery, investigation and preparation for trial of
13 this matter has not been completed as of the date of these responses, and, therefore, Plaintiff does
14 not purport to state anything more than information presently known and discovered by him.

15 Plaintiff, in responding to these Requests, reserves the right to continue discovery and
16 investigation in this matter for facts, witnesses and supporting data that may recall information
17 which, if he had presently within his knowledge, would be included in these responses. For
18 example, to the extent that any request calls for the identification of ‘all documents,’ it is
19 responded to fully insofar as information is presently available to Plaintiff, and Plaintiff is not
20 precluded from presenting at trial information discovered after the date of the response of this
21 request.

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

23 **GENERAL OBJECTIONS**

24 To avoid repetition in setting forth specific objections to interrogatories, responding party
25 sets forth and incorporates the following objections to responding party’s each and every
26 response.
27

28 A. RELEVENCY OBJECTION

1 Responding party objects on the basis that the interrogatory, in whole or in part, seek 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 B. CONFIDENTIALITY/PRIVACY OBJECTION

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

8 C. OVERBREADTH AND BURDEN OBJECTION

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

19 D. AMBIGUITY OBJECTION

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

24 E. AVAILABILITY OBJECTION

25 Responding party objects on the basis that the interrogatory is equally accessible to all parties
26 or is more accessible to the propounding party or which is maintained primarily by persons or
27 entities other than responding party.
28

1 F. IMPROPER FORM OBJECTION

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

6 G. LEGAL CONCLUSION OBJECTION

7 Responding party objects on the basis that the interrogatory calls for a legal conclusion.

8 H. ATTORNEY WORK-PRODUCT OBJECTION

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

11 I. MARITAL PRIVILEGE OBJECTION

12 Responding party objects on the basis that the request, in whole or in part, seek
13 disclosure of information that is protected under marital privilege.

14 **RESPONSES TO FORM INTERROGATORIES - GENERAL (SET ONE)**

15 **FORM INTERROGATORY 1.1**

16 Anthony Marinaccio, Marinaccio Law, 225 W Broadway, Suite 103, Glendale, CA
17 91204; (818) 839-52520.

18 **FORM INTERROGATORY 17.1**

19 (a) Request for Admission No. 1:

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

27 (a) Request for Admission No. 2:

1 (b) It is unclear what is meant by “recover possession;”

2 (c) Defendant;

3 (d) Unknown; Defendant.

4 (a) Request for Admission No. 3:

5 (b) It is unclear what is meant by “notice of non-renewal;”

6 (c) Defendant;

7 (d) Unknown; Defendant.

8 (a) Request for Admission No. 4:

9 (b) It is unclear what is meant by “notice of non-renewal,” “modifying bathroom,” “pet;”

10 (c) Defendant;

11 (d) Unknown; Defendant.

12 (a) Request for Admission No. 5:

13 (b) It is unclear what is meant by “notice of non-renewal,” “relative;”

14 (c) Defendant;

15 (d) Unknown; Defendant.

16 (a) Request for Admission No. 6:

17 (b) It is unclear what is meant by “first written communication;”

18 (c) Defendant;

19 (d) Unknown; Defendant.

20 (a) Request for Admission No. 7:

21 (b) It is unclear what is meant by “written,” “concerning,” “water intrusion;”

22 (c) Defendant;

23 (d) Unknown; Defendant.

24 (a) Request for Admission No. 8:

25 (b) It is unclear what is meant by “concerning,” “unresolved issues;”

26 (c) Defendant;

27 (d) Unknown; Defendant.

1 (a) Request for Admission No. 9:

2 (b) It is unclear what is meant by “complete,” “water intrusion;”

3 (c) Defendant;

4 (d) Unknown; Defendant.

5 (a) Request for Admission No. 10:

6 (b) It is unclear what is meant by “submitted,” “regarding,” “condition;”

7 (c) Defendant;

8 (d) Unknown; Defendant.

9 (a) Request for Admission No. 11:

10 (b) It is unclear what is meant by “submitted,” “regarding,” “condition;”

11 (c) Defendant;

12 (d) Unknown; Defendant.

13 (a) Request for Admission No. 12:

14 (b) It is unclear what is meant by “writing,” “regarding;”

15 (c) Defendant;

16 (d) Unknown; Defendant.

17 (a) Request for Admission No. 13:

18 (b) It is unclear what is meant by “follow-up communication,” “requesting;”

19 (c) Defendant;

20 (d) Unknown; Defendant.

21 (a) Request for Admission No. 14:

22 (b) It is unclear what is meant by “habitability-related,” “California law;”

23 (c) Defendant;

24 (d) Unknown; Defendant.

25 (a) Request for Admission No. 15:

26 (b) It is unclear what is meant by “knowledge;”

27 (c) Defendant;

28

(d) Unknown; Defendant.

(a) Request for Admission No. 16:

(b) It is unclear what is meant by “knowledge;”

(c) Defendant;

(d) Unknown; Defendant.

(a) Request for Admission No. 17:

(b) It is unclear what is meant by “any intention;”

(c) Defendant;

(d) Unknown; Defendant.

(a) Request for Admission No. 18:

(b) It is unclear what is meant by “reasons,” “non-renewal notice;”

(c) Defendant;

(d) Unknown; Defendant.

(a) Request for Admission No. 19:

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.

(a) Request for Admission No. 20:

(b) It is unclear what is meant by “produced,” “confirming;”

(c) Defendant;

(d) Unknown; Defendant.

(a) Request for Admission No. 22:

(b) It is unclear what is meant by “assisted living facility;”

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(c) Defendant;
(d) Unknown; Defendant.

DATED: 5/30/2025

MARINACCIO LAW

BY: /S/_____

Anthony Marinaccio, Esq.
Attorney for Plaintiffs,
Bradford M. Martinez; Vicki L. Martinez; Gail
Diane Calhoun aka Gail Diane Houser