

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. 10:**

4 Admit that DEFENDANT submitted a COMPLAINT to the California Civil Rights  
5 Department in or about September 2024 regarding the condition of the PREMISES.  
6

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 10**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous  
9 regarding the term “submitted “regarding,” “condition.” Responding Party objects to this request  
10 on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the  
11 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and  
12 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing  
13 objections, Responding Party responds as follows:  
14

15 Responding Party is unable to comply with this request as propounded. Responding Party  
16 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to  
17 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and  
18 further investigation, legal research and analysis will supply additional facts and provide new and  
19 different meaning to known facts, and may establish new factual conclusions and legal contentions,  
20 all of which may result in additional changes and/or variations from the responses set herein and  
21 Responding Party reserves the right to supplement this response at a later time as appropriate, up  
22 to and including at trial.  
23  
24

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

26 Admit that DEFENDANT submitted a COMPLAINT to the Los Angeles County  
27 Department of Public Health in or about October 2024 regarding the condition of the PREMISES.  
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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 11**

2 Responding Party objects to this request on the grounds that it is vague and ambiguous  
3 regarding the term “submitted “regarding,” “condition.” Responding Party objects to this request  
4 on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the  
5 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and  
6 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing  
7 objections, Responding Party responds as follows:  
8

9 Responding Party is unable to comply with this request as propounded. Responding Party  
10 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to  
11 enable it to admit or deny. 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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19 **REQUEST FOR ADMISSION NO. 12:**

20 Admit that DEFENDANT followed up in writing with PLAINTIFF regarding REPAIRS  
21 to the PREMISES on or about January 28, 2025.  
22

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 12**

24 Responding Party objects to this request on the grounds that it is vague and ambiguous  
25 regarding the term “writing,” “regarding.” Responding Party objects to this request on the grounds  
26 that it is not reasonably limited in scope, not reasonably calculated to lead to the discovery of  
27 admissible or relevant evidence and it is overbroad, burdensome, and oppressing and is only  
28

1 designed to harass Responding Party. Notwithstanding and without waiving the foregoing  
2 objections, Responding Party responds as follows:

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

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

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

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17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13**

18         Responding Party objects to this request on the grounds that it is vague and ambiguous  
19 regarding the term “follow-up communication,” “requesting.” Responding Party objects to this  
20 request on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead  
21 to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and  
22 oppressing and is only designed to harass Responding Party. Notwithstanding and without waiving  
23 the foregoing objections, Responding Party responds as follows:

24  
25         Responding Party is unable to comply with this request as propounded. Responding Party  
26 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to  
27 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and  
28

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

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

8 Admit that DEFENDANT's habitability-related COMPLAINTS and REPAIR REQUESTS  
9 constitute PROTECTED ACTIVITY under California law.  
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11 **RESPONSE TO REQUEST FOR ADMISSION NO. 14**

12 Responding Party objects to this request on the grounds that it is vague and ambiguous  
13 regarding the term "habitability-related," "California law." Responding Party objects to this  
14 request on the grounds that it is vague and ambiguous regarding the term "habitability-related" as  
15 it calls for a legal conclusion. Responding Party objects to this request on the grounds that it is not  
16 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible  
17 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only  
18 designed to harass Responding Party. Notwithstanding and without waiving the foregoing  
19 objections, Responding Party responds as follows:  
20

21 Responding Party is unable to comply with this request as propounded. Responding Party  
22 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to  
23 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and  
24 further investigation, legal research and analysis will supply additional facts and provide new and  
25 different meaning to known facts, and may establish new factual conclusions and legal contentions,  
26 all of which may result in additional changes and/or variations from the responses set herein and  
27  
28

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. 15:**

4 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the  
5 California Civil Rights Department before serving the NOTICE.  
6

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 15**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous  
9 regarding the term “knowledge.” Responding Party objects to this request on the grounds that it is  
10 vague and ambiguous regarding the term “COMPLAINT” as the term is defined by Propounding  
11 Party but used in this request. Responding Party objects to this request on the grounds that it is not  
12 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible  
13 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only  
14 designed to harass Responding Party. Notwithstanding and without waiving the foregoing  
15 objections, Responding Party responds as follows:  
16  
17

18 Responding Party is unable to comply with this request as propounded. Responding Party  
19 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to  
20 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and  
21 further 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 contentions,  
23 all of which may result in additional changes and/or variations from the responses set herein and  
24 Responding Party reserves the right to supplement this response at a later time as appropriate, up  
25 to and including at trial.  
26

27 **REQUEST FOR ADMISSION NO. 16:**  
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