

1 BRADFORD M. MARTINEZ (“Responding Party”) hereby provides its response to
2 JENNIFER BURBANK’S (“Propounding Party”) Request for Production of Documents (Set One)
3 as 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, admissibility
7 and any other objections and grounds that would require the exclusion of any statement herein if
8 any document was asked of, or if any statement contained therein were made by a witness present
9 and testifying in court, all of which objections and grounds are reserved and may be interposed at
10 the time of trial.

11 Defendant 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 this
13 matter has not been completed as of the date of these responses, and, therefore, Defendant does not
14 purport to state anything more than information presently known and discovered by him.

15 Defendant, 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 responded
19 to fully insofar as information is presently available to Defendant, and Defendant is not precluded
20 from presenting at trial information discovered after the date of the response of this request.

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

22 **GENERAL OBJECTIONS**

23 To avoid repetition in setting forth specific objections to interrogatories, Responding Party

1 sets forth and incorporates the following objections to Responding Party's each and every
2 response.

3 A. RELEVANCE OBJECTION

4 Responding party objects on the basis that the interrogatory, in whole or in part, seeks the
5 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
6 calculated to lead to the discovery of admissible evidence.

7 B. CONFIDENTIALITY/PRIVACY OBJECTION

8 Responding party objects on the basis that the interrogatory seeks the disclosure of confidential
9 information and constitutes an attempt to invade the personal and/or financial privacy of certain
10 individuals or persons.

11 C. OVERBREADTH AND BURDEN OBJECTION

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

22 D. AMBIGUITY OBJECTION

Responding party objects on the basis that the interrogatory is phrased in language that is vague,

1 ambiguous, and uncertain such that Responding Party is unable to ascertain what information is
2 sought and in order to respond to this interrogatory, Responding Party would have to speculate as
3 to Propounding Party's intended meaning.

4 E. AVAILABILITY OBJECTION

5 Responding party objects on the basis that the interrogatory is equally accessible to all parties
6 or is more accessible to the Propounding Party or which is maintained primarily by persons or
7 entities other than Responding Party.

8 F. IMPROPER FORM OBJECTION

9 Responding party objects on the basis that the interrogatory is phrased in improper form
10 because the interrogatory is not "full and complete in and of itself"; or because it contains subpart,
11 "compound, conjunctive or disjunctive" question, such that the interrogatory does not comply with
12 the requirements of *California Code of Civil Procedure* §2030.060

13 G. LEGAL CONCLUSION OBJECTION

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

15 H. ATTORNEY WORK-PRODUCT OBJECTION

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

18 I. MARITAL PRIVILEGE OBJECTION

19 Responding party objects on the basis that the request, in whole or in part, seeks
20 disclosure of information that is protected under marital privilege.

21 **REQUEST NO. 1**

22 All DOCUMENTS that support YOUR contention that Robert L. Fernandez intends or
intended to move into the PREMISES.

1 **RESPONSE TO REQUEST NO. 1**

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

9 **REQUEST NO. 2**

10 All DOCUMENTS referencing, signed by, or authored by Robert L. Fernandez
11 CONCERNING his alleged intent to move into the PREMISES.

12 **RESPONSE TO REQUEST NO. 2**

13 Responding Party objects to this request on the grounds that it is vague and ambiguous
14 regarding the term "referencing." Responding Party objects to this request on the grounds that a
15 response would necessitate the preparation or the making of a compilation, abstract, audit, or
16 summary of information. See Cal. Code Civ. Proc. Section 2030.230. Responding Party objects
17 to this request on the grounds that it is overbroad, burdensome, oppressing, not reasonably
18 limited in scope or time, and is only designed to harass Responding Party. Notwithstanding and
19 without waiving the foregoing objections, Responding Party responds as follows:

20 Responding Party produces all relevant documents in Responding Party's possession or
21 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
22 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

1 may establish new factual conclusions and legal contentions, all of which may result in additional
2 changes and/or variations from the responses set herein and Responding Party reserves the right
3 to supplement this response at a later time as appropriate, up to and including at trial.

4 **REQUEST NO. 3**

5 All DOCUMENTS relating to the physical condition or medical needs of Robert L.
6 Fernandez between July 2024 and the present, including any DOCUMENTS reflecting his
7 residency in any ASSISTED LIVING FACILITY.

8 **RESPONSE TO REQUEST NO. 3**

9 Responding Party objects to this request on the grounds that it is vague and ambiguous
10 regarding the term “relating,” “physical condition,” “medical needs,” “reflecting” “residency.”
11 Responding Party objects to this request on the grounds that it is not reasonably limited in scope.
12 Furthermore, this request is not reasonably calculated to lead to the discovery of admissible or
13 relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
14 designed to harass Responding Party. Responding Party further objects to this request on the
15 grounds that a response would necessitate the preparation or the making of a compilation,
16 abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230.
17 Additionally, this request seeks confidential, private and/or privileged documents of third parties
18 not part of the present unlawful detainer matter bearing case number 25PDUD00999 (“Action”),
19 the disclosure of which would violate their right to privacy. This request seeks information
20 protected by disclosure by the attorney-client privilege and/or work-product doctrine and/or
21 information prepared in anticipation of litigation, including physician-patient privilege.
22 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
follows:

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

8 **REQUEST NO. 4**

9 All DOCUMENTS YOU relied upon in preparing, drafting, or serving the NOTICE.

10 **RESPONSE TO REQUEST NO. 4**

11 Responding Party objects to this request on the grounds that it is not reasonably limited in
12 scope. Furthermore, this request is not reasonably calculated to lead to the discovery of
13 admissible or relevant evidence and it is compound, overbroad, burdensome, and oppressing and
14 is only designed to harass Responding Party. Responding Party further objects to this request on
15 the grounds that a response would necessitate the preparation or the making of a compilation,
16 abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230. This
17 request seeks information protected by disclosure by the attorney-client privilege and/or work-
18 product doctrine and/or information prepared in anticipation of litigation, including physician-
19 patient privilege. Notwithstanding and without waiving the foregoing objections, Responding
20 Party responds as follows:

21 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
22 with this request as propounded. Discovery is ongoing and it is anticipated that additional
discovery and further investigation, legal research and analysis will supply additional facts and

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

5 **REQUEST NO. 5**

6 All DOCUMENTS CONCERNING REPAIR REQUESTS made by DEFENDANT
7 between September 2024 and January 2025.

8 **RESPONSE TO REQUEST NO. 5**

9 Responding Party objects to this request on the grounds that it is not reasonably
10 calculated to lead to the discovery of admissible or relevant evidence and it is overbroad,
11 burdensome, and oppressing and is only designed to harass Responding Party. Responding Party
12 further objects to this request on the grounds that a response would necessitate the preparation or
13 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.
14 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged
15 documents of third parties not part of this Action, the disclosure of which would violate their
16 right to privacy. This request seeks information protected by disclosure by the attorney-client
17 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation.
18 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
19 follows:

20 Responding Party produces all relevant documents in Responding Party's possession or
21 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
22 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

1 may establish new factual conclusions and legal contentions, all of which may result in additional
2 changes and/or variations from the responses set herein and Responding Party reserves the right
3 to supplement this response at a later time as appropriate, up to and including at trial.

4 **REQUEST NO. 6**

5 All DOCUMENTS CONCERNING any response by PLAINTIFF or PROPERTY
6 MANAGER to the REPAIR REQUESTS referenced in Request No. 5.

7 **RESPONSE TO REQUEST NO. 6**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “any response.” Responding Party objects to this request on the grounds that it
10 is not reasonably limited in scope. Furthermore, this request is not reasonably calculated to lead to
11 the discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing
12 and is only designed to harass Responding Party. Responding Party further objects to this request
13 on the grounds that a response would necessitate the preparation or the making of a compilation,
14 abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230.
15 Additionally, this request seeks confidential, private and/or privileged documents of third parties
16 not part of this Action, the disclosure of which would violate their right to privacy. This request
17 seeks information protected by disclosure by the attorney-client privilege and/or work-product
18 doctrine and/or information prepared in anticipation of litigation. Notwithstanding and without
19 waiving the foregoing objections, Responding Party responds as follows:

20 Responding Party produces all relevant documents in Responding Party’s possession or
21 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
22 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

1 may establish new factual conclusions and legal contentions, all of which may result in additional
2 changes and/or variations from the responses set herein and Responding Party reserves the right
3 to supplement this response at a later time as appropriate, up to and including at trial.

4 **REQUEST NO. 7**

5 All DOCUMENTS CONCERNING water intrusion, moisture, mold, or plumbing issues at
6 the PREMISES from September 2024 to the present.

7 **RESPONSE TO REQUEST NO. 7**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “water intrusion,” “moisture,” “plumbing issues.” Responding Party objects to
10 this request on the grounds that it is vague and ambiguous regarding the term “mold” as it calls for
11 a legal conclusion. Responding Party objects to this request on the grounds that it is not reasonably
12 limited in scope. Furthermore, this request is not reasonably calculated to lead to the discovery of
13 admissible or relevant evidence and it is compound, overbroad, burdensome, and oppressive and
14 is only designed to harass Responding Party. Responding Party further objects to this request on
15 the grounds that a response would necessitate the preparation or the making of a compilation,
16 abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230.
17 Additionally, this request seeks confidential, private and/or privileged documents of third parties
18 not part of this Action, the disclosure of which would violate their right to privacy. This request
19 seeks information protected by disclosure by the attorney-client privilege and/or work-product
20 doctrine and/or information prepared in anticipation of litigation. Notwithstanding and without
21 waiving the foregoing objections, Responding Party responds as follows:

22 Responding Party produces all relevant documents in Responding Party’s possession or
control which are attached hereto or sent concurrently with these responses. Discovery is ongoing

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

6 **REQUEST NO. 8**

7 All COMMUNICATIONS between PLAINTIFF and DEFENDANT between September
8 1, 2024, and January 30, 2025.

9 **RESPONSE TO REQUEST NO. 8**

10 Responding Party objects to this request on the grounds that it is not reasonably limited in
11 scope. Furthermore, this request is not reasonably calculated to lead to the discovery of admissible
12 or relevant evidence and it is overbroad, burdensome, and oppressive and is only designed to harass
13 Responding Party. Responding Party further objects to this request on the grounds that a response
14 would necessitate the preparation or the making of a compilation, abstract, audit, or summary of
15 information. See Cal. Code Civ. Proc. Section 2030.230. Notwithstanding and without waiving the
16 foregoing objections, Responding Party responds as follows:

17 Responding Party produces all relevant documents in Responding Party's possession or
18 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
19 and it is anticipated that additional discovery and further investigation, legal research and
20 analysis will supply additional facts and provide new and different meaning to known facts, and
21 may establish new factual conclusions and legal contentions, all of which may result in additional
22 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 **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.

5 **RESPONSE TO REQUEST NO. 9**

6 Responding Party objects to this request on the grounds that it is vague and ambiguous
7 regarding the term "criticism," "statement." Responding Party objects to this request on the
8 grounds that it is vague and ambiguous regarding the term "habitability" as it calls for a legal
9 conclusion. Responding Party objects to this request on the grounds that it is not reasonably limited
10 in scope or time. Furthermore, this request is not reasonably calculated to lead to the discovery of
11 admissible or relevant evidence and it is compound, overbroad, burdensome, and oppressing and
12 is only designed to harass Responding Party. Responding Party further objects to this request on
13 the grounds that a response would necessitate the preparation or the making of a compilation,
14 abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230.
15 Additionally, this request seeks confidential, private and/or privileged documents of third parties
16 not part of this Action, the disclosure of which would violate their right to privacy. This request
17 seeks information protected by disclosure by the attorney-client privilege and/or work-product
18 doctrine and/or information prepared in anticipation of litigation. Notwithstanding and without
19 waiving the foregoing objections, Responding Party responds as follows:

20 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
21 with this request because no such document exists or is no longer in possession of Responding
22 Party. 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

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

5 **REQUEST NO. 10**

6 All DOCUMENTS PLAINTIFF provided to any third party, including Robert L.
7 Fernandez, PROPERTY MANAGER, or legal counsel, CONCERNING DEFENDANT'S
8 REPAIR REQUESTS or habitability COMPLAINTS.

9 **RESPONSE TO REQUEST NO. 10**

10 Responding Party objects to this request on the grounds that it is vague and ambiguous
11 regarding the term “third party,” “legal counsel.” Responding Party objects to this request on the
12 grounds that it is vague and ambiguous regarding the term “habitability” as it calls for a legal
13 conclusion. Responding Party objects to this request on the grounds that it is not reasonably
14 limited in scope or time. Furthermore, this request is not reasonably calculated to lead to the
15 discovery of admissible or relevant evidence and it is compound, overbroad, burdensome, and
16 oppressive and is only designed to harass Responding Party. Responding Party further objects to
17 this request on the grounds that a response would necessitate the preparation or the making of a
18 compilation, abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section
19 2030.230. Additionally, this request seeks confidential, private and/or privileged documents of
20 third parties not part of this Action, the disclosure of which would violate their right to privacy.
21 This request seeks information protected by disclosure by the attorney-client privilege and/or
22 work-product doctrine and/or information prepared in anticipation of litigation. Notwithstanding
and without waiving the foregoing objections, Responding Party responds as follows:

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

8 **REQUEST NO. 11**

9 All DOCUMENTS CONCERNING the June 19, 2024 non-renewal notice served on
10 DEFENDANT.

11 **RESPONSE TO REQUEST NO. 11**

12 Responding Party objects to this request on the grounds that it is vague and ambiguous
13 regarding the term “non-renewal notice,” “served.” Responding Party objects to this request on
14 the grounds that it is not reasonably limited in scope. Furthermore, this request is not reasonably
15 calculated to lead to the discovery of admissible or relevant evidence and it is overbroad,
16 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party
17 further objects to this request on the grounds that a response would necessitate the preparation or
18 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.
19 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged
20 documents of third parties not part of this Action, the disclosure of which would violate their
21 right to privacy. This request seeks information protected by disclosure by the attorney-client
22 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation.

1 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
2 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.

10 **REQUEST NO. 12**

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

13 **RESPONSE TO REQUEST NO. 12**

14 Responding Party objects to this request on the grounds that it is vague and ambiguous
15 regarding the term “reflecting” “any determination,” “owner,” “relative.” Responding Party
16 objects to this request on the grounds that it is not reasonably limited in scope or time.
17 Furthermore, this request is not reasonably calculated to lead to the discovery of admissible or
18 relevant evidence and it is duplicative of other discovery requests, overbroad, burdensome, and
19 oppressing and is only designed to harass Responding Party. Responding Party further objects to
20 this request on the grounds that a response would necessitate the preparation or the making of a
21 compilation, abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section
22 2030.230. Additionally, this request seeks confidential, private and/or privileged documents of
third parties not part of this Action, the disclosure of which would violate their right to privacy.

1 This request seeks information protected by disclosure by the attorney-client privilege and/or
2 work-product doctrine and/or information prepared in anticipation of litigation. Notwithstanding
3 and without waiving the foregoing objections, Responding Party responds as follows:

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

11 **REQUEST NO. 13**

12 All DOCUMENTS CONCERNING PLAINTIFF'S compliance or claimed exemption from
13 the Tenant Protection Act (Civil Code§ 1946.2) in relation to this TENANCY.

14 **RESPONSE TO REQUEST NO. 13**

15 Responding Party objects to this request on the grounds that it is compound, overbroad,
16 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party
17 objects on the ground that it is unable to determine which sections and corresponding subparts of
18 the various Civil Code Sections cited by Propounding Party (Civil Code sections 1946.2) this
19 request concerns. Responding Party further objects to this request on the grounds that a response
20 would necessitate the preparation or the making of a compilation, abstract, audit, or summary of
21 information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this request seeks
22 confidential, private and/or privileged documents of third parties not part of the present Action, the
disclosure of which would violate their right to privacy. This request seeks information protected

1 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
2 prepared in anticipation of litigation. Notwithstanding and without waiving the foregoing
3 objections, Responding Party responds as follows:

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

11 **REQUEST NO. 14**

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

14 **RESPONSE TO REQUEST NO. 14**

15 Responding Party objects to this request on the grounds that it is vague and ambiguous
16 regarding the term “government agency.” Responding Party objects to this request on the grounds
17 that it is not reasonably limited in scope or time. Furthermore, this request is not reasonably
18 calculated to lead to the discovery of admissible or relevant evidence and it is duplicative of other
19 discovery requests, compound, overbroad, burdensome, and oppressive and is only designed to
20 harass Responding Party. Responding Party further objects to this request on the grounds that a
21 response would necessitate the preparation or the making of a compilation, abstract, audit, or
22 summary of information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this request
23 seeks confidential, private and/or privileged documents of third parties not part of this Action, the

1 disclosure of which would violate their right to privacy. This request seeks information protected
2 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
3 prepared in anticipation of litigation. Notwithstanding and without waiving the foregoing
4 objections, Responding Party responds as follows:

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

12 **REQUEST NO. 15**

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

15 **RESPONSE TO REQUEST NO. 15**

16 Responding Party objects to this request on the grounds that it is vague and ambiguous
17 regarding the term “submitted to,” “received,” “government entity.” Responding Party objects to
18 this request on the grounds that it is not reasonably limited in scope or time. Furthermore, this
19 request is not reasonably calculated to lead to the discovery of admissible or relevant evidence and
20 it is duplicative of other discovery requests, overbroad, burdensome, and oppressive and is only
21 designed to harass Responding Party. Responding Party further objects to this request on the
22 grounds that a response would necessitate the preparation or the making of a compilation, abstract,
23 audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this

1 request seeks confidential, private and/or privileged documents of third parties not part of this
2 Action, the disclosure of which would violate their right to privacy. This request seeks information
3 protected by disclosure by the attorney-client privilege and/or work-product doctrine and/or
4 information prepared in anticipation of litigation. Notwithstanding and without waiving the
5 foregoing objections, Responding Party responds as follows:

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

13 **REQUEST NO. 16**

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

15 **RESPONSE TO REQUEST NO. 16**

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

23 ///

1 **REQUEST NO. 17**

2 All DOCUMENTS CONCERNING any INSPECTIONS conducted at the PREMISES
3 from July 2024 to the present.

4 **RESPONSE TO REQUEST NO. 17**

5 Responding Party objects to this request on the grounds that it is not reasonably limited in
6 scope. Furthermore, this request is not reasonably calculated to lead to the discovery of admissible
7 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
8 designed to harass Responding Party. Responding Party further objects to this request on the
9 grounds that a response would necessitate the preparation or the making of a compilation, abstract,
10 audit, or summary of information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this
11 request seeks confidential, private and/or privileged documents of third parties not part of the
12 present Action, the disclosure of which would violate their right to privacy. This request seeks
13 information protected by disclosure by the attorney-client privilege and/or work-product doctrine
14 and/or information prepared in anticipation of litigation. Notwithstanding and without waiving the
15 foregoing objections, Responding Party responds as follows:

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

23 ///

1 **REQUEST NO. 18**

2 All DOCUMENTS CONCERNING any legal advice or internal discussion about the
3 decision to terminate DEFENDANT'S TENANCY between January 1, 2025, and January 30,
4 2025.

5 **RESPONSE TO REQUEST NO. 18**

6 Responding Party objects to this request on the grounds that it is vague and ambiguous
7 regarding the term "legal advice," "internal discussions." Responding Party objects to this request
8 on the grounds that it is not reasonably limited in scope. Furthermore, this request is not reasonably
9 calculated to lead to the discovery of admissible or relevant evidence and it is compound,
10 overbroad, burdensome, and oppressing and is only designed to harass Responding Party.
11 Responding Party further objects to this request on the grounds that a response would necessitate
12 the preparation or the making of a compilation, abstract, audit, or summary of information. See
13 Cal. Code Civ. Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or
14 privileged documents of third parties not part of this Action, the disclosure of which would violate
15 their right to privacy. This request seeks information protected by disclosure by the attorney-client
16 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation,
17 including physician-patient privilege. Notwithstanding and without waiving the foregoing
18 objections, Responding Party responds as follows:

19 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
20 with this request as propounded. Discovery is ongoing and it is anticipated that additional
21 discovery and further investigation, legal research and analysis will supply additional facts and
22 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

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

3 **REQUEST NO. 19**

4 All DOCUMENTS showing PAYMENTS received from the DEFENDANT from one (1)
5 month prior to the commencement of DEFENDANT'S TENANCY until the present, including
6 receipts, ledgers, and payment logs.

7 **RESPONSE TO REQUEST NO. 19**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term "commencement of," in reference to DEFENDANT'S TENANCY.
10 Responding Party objects to this request on the grounds that it is not reasonably limited in scope
11 or time. Furthermore, this request is not reasonably calculated to lead to the discovery of admissible
12 or relevant evidence and it is overbroad, burdensome, and oppressive and is only designed to harass
13 Responding Party. Responding Party further objects to this request on the grounds that a response
14 would necessitate the preparation or the making of a compilation, abstract, audit, or summary of
15 information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this request seeks
16 confidential, private and/or privileged documents of third parties not part of this Action, the
17 disclosure of which would violate their right to privacy. Notwithstanding and without waiving the
18 foregoing objections, Responding Party responds as follows:

19 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
20 with this request because no such document exists or is no longer in possession of Responding
21 Party. Discovery is ongoing and it is anticipated that additional discovery and further
22 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

1 contentions, all of which may result in additional changes and/or variations from the responses
2 set herein and Responding Party reserves the right to supplement this response at a later time as
3 appropriate, up to and including at trial.

4 **REQUEST NO. 20**

5 All DOCUMENTS pertaining to RENTAL AGREEMENTS between PLAINTIFF and
6 DEFENDANT.

7 **RESPONSE TO REQUEST NO. 20**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “pertaining to.” Responding Party objects to this request on the grounds that it
10 is not reasonably limited in scope or time. Furthermore, this request is not reasonably calculated to
11 lead to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and
12 oppressing and is only designed to harass Responding Party. Responding Party further objects to
13 this request on the grounds that a response would necessitate the preparation or the making of a
14 compilation, abstract, audit, or summary of information. See Cal. Code Civ. Proc. Section
15 2030.230. Additionally, this request seeks confidential, private and/or privileged documents of
16 third parties not part of this Action, the disclosure of which would violate their right to privacy.
17 This request seeks information protected by disclosure by the attorney-client privilege and/or
18 work-product doctrine and/or information prepared in anticipation of litigation, including
19 physician-patient privilege. Notwithstanding and without waiving the foregoing objections,
20 Responding Party responds as follows:

21 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
22 with this request as propounded. Discovery is ongoing and it is anticipated that additional
discovery and further investigation, legal research and analysis will supply additional facts and

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

5 **REQUEST NO. 21**

6 All DOCUMENTS that establish PLAINTIFF'S ownership interest in the PREMISES,
7 including but not limited to grant deeds, title reports, or recorded documents.

8 **RESPONSE TO REQUEST NO. 21**

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

16 **REQUEST NO. 22**

17 All DOCUMENTS that demonstrate PLAINTIFF had the legal right to recover possession
18 of the PREMISES at the time the NOTICE was served.

19 **RESPONSE TO REQUEST NO. 22**

20 Responding Party produces all relevant documents in Responding Party's possession or
21 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
22 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

1 may establish new factual conclusions and legal contentions, all of which may result in additional
2 changes and/or variations from the responses set herein and Responding Party reserves the right
3 to supplement this response at a later time as appropriate, up to and including at trial.

4 **REQUEST NO. 23**

5 All DOCUMENTS CONCERNING the legal formation and current status of any entity
6 that claims to own or manage the PREMISES.

7 **RESPONSE TO REQUEST NO. 23**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “legal formation,” “current status” “any entity.” Responding Party objects to
10 this request on the grounds that it is not reasonably limited in scope or time. Furthermore, this
11 request is not reasonably calculated to lead to the discovery of admissible or relevant evidence
12 and it is compound, overbroad, burdensome, and oppressing and is only designed to harass
13 Responding Party. Responding Party further objects to this request on the grounds that a response
14 would necessitate the preparation or the making of a compilation, abstract, audit, or summary of
15 information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this request seeks
16 confidential, private and/or privileged documents of third parties not part of this Action, the
17 disclosure of which would violate their right to privacy. This request seeks information protected
18 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
19 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and
20 without waiving the foregoing objections, Responding Party responds as follows:

21 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
22 with this request because no such document exists or is no longer in possession of Responding
Party. Discovery is ongoing and it is anticipated that additional discovery and further