

1 privilege and attorney work product doctrine and/or premature disclosure of expert witness  
2 information in violation of *Code of Civil Procedure* §§ 2018 and 2034. Subject to the foregoing  
3 objections, and without waiving them, Responding Party responds as follows:

4       After a diligent search and a reasonable inquiry, Responding Party is unable to comply with  
5 this request as propounded. 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  
to and including at trial.

10 **SPECIAL INTERROGATORY NO. 20**

11       State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT  
had complained about water intrusion at the PREMISES.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 20**

13       Responding Party objects to this request on the grounds that it is vague and ambiguous  
14 regarding the term “aware,” “water intrusion,” “complained.” This interrogatory is overbroad,  
15 vague, unduly burdensome, and oppressive in scope and time. This request is also duplicative of  
16 other discovery requests. Subject to the foregoing objections, and without waiving them,  
Responding Party responds as follows:

17       See response to Special Interrogatory No. 11. Discovery is ongoing and it is anticipated  
18 that additional discovery and further investigation, legal research and analysis will supply  
19 additional facts and provide new and different meaning to known facts, and may establish new  
20 factual conclusions and legal contentions, all of which may result in additional changes and/or  
21 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.

22 **SPECIAL INTERROGATORY NO. 21**

1 IDENTIFY the date YOU first received a REPAIR REQUEST from DEFENDANT  
2 CONCERNING water intrusion at the PREMISES.

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

4 Responding Party objects to this request on the grounds that it is vague and ambiguous  
5 regarding the term “received,” “water intrusion.” Responding Party objects to this request on the  
6 grounds that it is vague and ambiguous regarding the term “IDENTIFY” in reference to “date.”  
7 This interrogatory is overbroad, vague, unduly burdensome, and oppressive in scope and time. This  
8 request is also duplicative of other discovery requests. Subject to the foregoing objections, and  
9 without waiving them, Responding Party responds as follows:

10 See responses to Special Interrogatory Nos. 11, 20. Discovery is ongoing and it is  
11 anticipated that additional discovery and further investigation, legal research and analysis will  
12 supply additional facts and provide new and different meaning to known facts, and may establish  
13 new factual conclusions and legal contentions, all of which may result in additional changes and/or  
14 variations from the responses set herein and Responding Party reserves the right to supplement this  
15 response at a later time as appropriate, up to and including at trial.

16 **SPECIAL INTERROGATORY NO. 22**

17 IDENTIFY all REPAIR REQUESTS received from DEFENDANT between September 1,  
18 2024, and January 30, 2025.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 22**

20 Responding Party objects to this request on the grounds that it is vague and ambiguous  
21 regarding the term “received,” Responding Party objects in that this request seeks information  
22 equally available to Propounding Party and is already within the Propounding Party’s possession  
23 thereby making the request overly burdensome, oppressive, and harassing. This interrogatory is  
24 overbroad, vague, unduly burdensome, and oppressive in scope and time. This interrogatory calls  
25 for a legal conclusion. Subject to the foregoing objections, and without waiving them, Responding  
26 Party responds as follows:

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

8 **SPECIAL INTERROGATORY NO. 23**

9 Describe all actions YOU took in response to DEFENDANT'S REPAIR REQUESTS  
10 referenced in Interrogatory No. 22.

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

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

24 Responding Party exercises its right to produce writings under Code of Civil Procedure  
25 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and  
26 further investigation, legal research and analysis will supply additional facts and provide new and  
27 different meaning to known facts, and may establish new factual conclusions and legal contentions,

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

4 **SPECIAL INTERROGATORY NO. 24**

5 State whether YOU received any written communication from DEFENDANT between  
6 January 25, 2025, and January 30, 2025.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 24**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous  
9 regarding the term “state,” “received,” “written communication.” Responding Party objects in that  
10 this request seeks information equally available to Propounding Party and is already within the  
11 Propounding Party’s possession thereby making the request overly burdensome, oppressive, and  
12 harassing. This interrogatory is overbroad, vague, unduly burdensome, and oppressive in scope  
13 and time. Subject to the foregoing objections, and without waiving them, Responding Party  
14 responds as follows:

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

21 **SPECIAL INTERROGATORY NO. 25**

22 If YOU received any written communication from DEFENDANT between January 25,  
23 2025, and January 30, 2025, IDENTIFY the DOCUMENT and state the date it was received.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 25**

25 Responding Party objects to this request on the grounds that it is vague and ambiguous  
26 regarding the term “state,” “received,” “written communication.” Responding Party objects in that  
27 this request seeks information equally available to Propounding Party and is already within the

1 Propounding Party's possession thereby making the request overly burdensome, oppressive, and  
2 harassing. This interrogatory is overbroad, vague, unduly burdensome, and oppressive in scope  
3 and time. Subject to the foregoing objections, and without waiving them, Responding Party  
4 responds as follows:

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

12 **SPECIAL INTERROGATORY NO. 26**

13 State whether the NOTICE was prepared or served in response to any communication  
14 from DEFENDANT regarding REPAIRS, water intrusion, or habitability.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 26**

16 Responding Party objects to this request on the grounds that it is vague and ambiguous  
17 regarding the term "state," "water intrusion," "any communication." Responding Party objects to  
18 this request on the grounds that it is vague and ambiguous regarding the term "habitability" as it  
19 calls for a legal conclusion. This interrogatory is compound, overbroad, vague, unduly  
20 burdensome, and oppressive in scope and time. Responding Party also objects to this request to the  
21 extent that it seeks information protected from disclosure by the attorney-client privilege and  
22 attorney work product doctrine and/or premature disclosure of expert witness information in  
violation of *Code of Civil Procedure* §§ 2018 and 2034. In addition, Responding Party also objects  
to this request on the grounds that it seeks information that impairs a person's 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: