

Lane E. Webb, Esq. (SBN 144671)  
Shanna Van Wagner (SBN 317675)  
**LYNBERG & WATKINS**  
185 West F Street, Suite 400  
San Diego, California 92101  
Telephone: (619) 814-2169  
Facsimile: (619) 356-4968  
Email: lwebb@lynberg.com  
[svanwagner@lynberg.com](mailto:svanwagner@lynberg.com)

Attorneys for Defendants BRAD MARTINEZ, VICKI MARTINEZ and GAIL D. CALHOUN,  
AS TRUSTEE OF THE GAIL D. CALHOUN FAMILY TRUST

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES – ALHAMBRA COURTHOUSE**

JAMES BURBANK, an individual;  
JENNIFER BURBANK, an individual;

Plaintiffs,

vs.

BRAD MARTINEZ, an individual; VICKI  
MARTINEZ, an individual; GAIL D.  
CALHOUN, as TRUSTEE of the GAIL D.  
CALHOUN FAMILY TRUST; LOTUS  
PROPERTY MANAGEMENT, INC.; BRIAN  
GORDON, an individual; SALLY  
GUTIERREZ, an individual; GRACE  
CHENG, an individual; DOES 1 – 50,  
inclusive;

Defendants.

CASE NO: 24NNCV06082

*Assigned for All Purposes to:*  
*Hon. Sarah J. Heidel .– Dept. V*

**DEFENDANT BRAD MARTINEZ’S  
REQUESTS FOR ADMISSIONS TO  
PLAINTIFF JAMES BURBANK, SET  
ONE**

*Trial Date: None Set*  
*Complaint Filed: November 25, 2024*

**PROPOUNDING PARTY : BRAD MARTINEZ**

**RESPONDING PARTY : JAMES BURBANK**

**SET NO. : ONE**

**TO PLAINTIFF JAMES BURBANK AND TO HIS RESPECTIVE ATTORNEYS  
OF RECORD:**

**PLEASE TAKE NOTICE** that, in accordance with *California Code of Civil Procedure* §  
2033.010 et seq., Defendant BRAD MARTINEZ (“Propounding Party”) hereby requests Plaintiff  
JAMES BURBANK (“Responding Party”) to admit the truth of each of the following Requests for  
Admissions, said requests to be admitted within the time prescribed by law.

1 **DEFINITIONS**

2 The term "DOCUMENTS" shall mean a writing as defined by California Evidence Code  
3 Section 250, including, but not limited to, handwriting, typewriting, printing, photography,  
4 photocopies, transmittals by electronic mail or facsimile, and every other means of recording upon  
5 any tangible thing, any form of communication or representation, including letters, words,  
6 pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless  
7 of the manner in which the record has been stored. It also includes, without limitation,  
8 electronically stored information generated and/or stored on YOUR computers, including e-mail,  
9 web pages, word processing files, audio and video files, images, computer databases, or on storage  
10 media, including hard drives (external and internal), thumb drives, CD-ROMS, and DVDs. To the  
11 extent that any of the DOCUMENTS responsive to these demands originate from electronic files,  
12 those files are to be produced in native format.

13 As used herein, the terms "YOU" and "YOUR" means Plaintiff JAMES BURBANK  
14 ("Responding Party") and his representatives, agents, assignors, and all persons or entities  
15 presently or formally acting for or purporting to act on behalf of same.

16 The term "COMPLAINT" shall refer to the Operative Complaint filed by Plaintiff on or  
17 about November 25, 2024, in the Superior Court of California, County of Los Angeles, Case  
18 Number 24NNCV06082.

19 The term "SUBJECT PROPERTY" shall refer to the rented apartment located at 518 N.  
20 Stoneman Avenue, Alhambra, California, as identified by Plaintiffs in their COMPLAINT.

21 The term "INCIDENT" or "INCIDENTS" shall refer to the factual allegations made in  
22 Plaintiff's COMPLAINT which Plaintiff alleges caused her to incur the alleged injuries and  
23 damages stated therein.

24 The term "DEFENDANT" shall refer to Propounding Party Defendant BRAD  
25 MARTINEZ, and his representatives, agents, assignors, and all persons or entities acting on his  
26 behalf.

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**REQUEST FOR ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:**

Admit that YOU entered into a lease agreement for the property located at 518 N. Stoneman Avenue, Alhambra, California.

**REQUEST FOR ADMISSION NO. 2:**

Admit that the original one-year lease agreement YOU signed for the SUBJECT PROPERTY did not allow pets.

**REQUEST FOR ADMISSION NO. 3:**

Admit that YOU violated the terms of YOUR lease agreement by keeping a dog at the SUBJECT PROPERTY.

**REQUEST FOR ADMISSION NO. 4:**

Admit that YOU never informed DEFENDANT about the dog until YOU were asked whether there was a dog at the SUBJECT PROPERTY.

**REQUEST FOR ADMISSION NO. 5:**

Admit that YOU did not have permission to keep a dog at the SUBJECT PROPERTY prior to September 2024.

**REQUEST FOR ADMISSION NO. 6:**

Admit that the SUBJECT PROPERTY has an upstairs bathroom with a shower.

**REQUEST FOR ADMISSION NO. 7:**

Admit that YOU removed the glass shower enclosure from the upstairs bathroom.

**REQUEST FOR ADMISSION NO. 8:**

Admit that YOU did not have permission to remove the glass shower enclosure.

**REQUEST FOR ADMISSION NO. 9:**

Admit that the removal of the glass shower enclosure from the upstairs bathroom caused damage to the bathroom.

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1 **REQUEST FOR ADMISSION NO. 10:**

2 Admit that YOU never paid for the damage resulting from the removal of glass shower  
3 enclosure.

4  
5  
6 DATED: March 21, 2025

**LYNBERG & WATKINS**  
A Professional Corporation



7  
8 By: \_\_\_\_\_

Lane E. Webb, Esq.  
Shanna M. Van Wagner, Esq.  
Attorneys for Defendants BRAD MARTINEZ,  
VICKI MARTINEZ and GAIL D. CALHOUN,  
as Trustee of the GAIL D. CALHOUN FAMILY  
TRUST

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 185 W F Street, Suite 400, San Diego, CA 92101.

On **March 21, 2025**, I served the foregoing document(s) described as **DEFENDANT BRAD MARTINEZ'S REQUEST FOR ADMISSIONS TO PLAINTIFF JAMES BURBANK, SET ONE** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

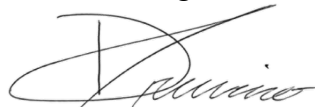
Joseph Kellener  
David R. Greene  
Dignity Law Group, APC  
14401 Sylvan St, Ste 102  
Van Nuys, CA 91401  
Tel: (323) 212 5365  
Email: info@dignitylawgroup.com

Counsel for Plaintiff(s):

- ☐ **BY MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, I deposited such envelope in the mail at San Diego, California.
- ☒ **BY E-MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted via email at the respective email address(es) indicated above.
- ☐ **BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.
- ☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.
- ☐ **BY ELECTRONIC TRANSFER** via electronic filing service provider and pursuant to *California Rules of Court*, Rule 2.251, sent by e-Service through e-Filing Portal at the time the documents were electronically filed. The service was made on the email addresses listed with the court.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **March 21, 2025**, at San Diego, California.



**Danielle Trevino**