

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

4 FORM INTERROGATORY 70.8

5  
6 Yes. Responding Party exercises its right to produce writings under Code of Civil  
7 Procedure Section 2030.210(a)(2). 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 FORM INTERROGATORY 70.9

14  
15 On or about 09/08/2023.

16 FORM INTERROGATORY 70.10

17  
18 Yes. Responding Party exercises its right to produce writings under Code of Civil  
19 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional  
20 discovery and further investigation, legal research and analysis will supply additional facts and  
21 provide new and different meaning to known facts, and may establish new factual conclusions  
22 and legal contentions, all of which may result in additional changes and/or variations from the  
23 responses set herein and Responding Party reserves the right to supplement this response at a  
24 later time as appropriate, up to and including at trial.

25 FORM INTERROGATORY 70.11

26  
27 (a) Responding Party exercises its right to produce writings under Code of Civil Procedure  
28

Section 2030.210(a)(2); Plaintiff, who can be contacted through their counsel of record.  
Defendant;

(b) None;

(c) None;

(d) Responding Party exercises its right to produce writings under Code of Civil Procedure

Section 2030.210(a)(2); Plaintiff, who can be contacted through their counsel of record.  
Defendant;

(e) None, to Responding Party's current knowledge;

FORM INTERROGATORY 70.12

(a) Lotus Property Management (Grace Cheng), 4157 East Live Oak Ave., Arcadia, CA  
91006;

(b) From on or about September 1, 2024 through December 1, 2024;

(c) General property management.

(a) Bradford M. Martinez; who can be contacted through their counsel of record;

(b) From on or about December 2, 2024 through the present date;

(c) General property management.

(a) Deen Houser; who can be contacted through Responding Party's counsel of record;

(b) From on or about December 2, 2024 through the present date;

(c) General property management.

FORM INTERROGATORY 70.13

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

1 and 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

6 FORM INTERROGATORY 70.14

7 Responding Party exercises its right to produce writings under Code of Civil Procedure  
8 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and  
9 further investigation, legal research and analysis will supply additional facts and provide new  
10 and different meaning to known facts, and may establish new factual conclusions and legal  
11 contentions, all of which may result in additional changes and/or variations from the responses  
12 set herein and Responding Party reserves the right to supplement this response at a later time as  
13 appropriate, up to and including at trial.  
14

15 FORM INTERROGATORY 71.1

16 Yes.  
17

18 FORM INTERROGATORY 71.2

19 (a) Responding Party exercises its right to produce writings under Code of Civil Procedure  
20 Section 2030.210(a)(2);  
21

22 (b) Responding Party, who can be contacted through Responding Party's counsel of record;  
23 Defendant;  
24

25 (c) Responding Party exercises its right to produce writings under Code of Civil Procedure  
26 Section 2030.210(a)(2). Responding Party, who can be contacted through their counsel of  
27 record; Defendant.  
28

1 FORM INTERROGATORY 71.3

2           Responding Party exercises its right to produce writings under Code of Civil Procedure  
3 Section 2030.210(a)(2).  
4  
5

<u>Date</u>	<u>Activity</u>	<u>Purpose</u>	<u>Amount</u>
<u>1/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for "518</u> <u>stoneman feb 2024</u> <u>rent"; Conf#...</u>	<u>February 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>1/31/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "518 Stoneman</u> <u>Feb"; Conf#</u> <u>vm20wywxq</u>	<u>February 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>2/28/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "518 Stoneman";</u> <u>Conf# smwaugbt</u>	<u>March 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>3/1/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for "518</u> <u>N Stoneman Ave -</u> <u>March 2024";...</u>	<u>March 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>3/26/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "April Stoneman</u> <u>rent"; Conf#</u> <u>y7st738bg</u>	<u>April 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>3/27/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BARREDA for</u> <u>"April rent - 518 N</u> <u>Stoneman Ave";...</u>	<u>April 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>4/26/2024</u>	<u>Zelle payment from</u> <u>JAMES BURBANK</u> <u>for "May Stoneman";</u>	<u>May 2024 Rent</u>	<u>\$ 2,000.00</u>

Conf# yvu6sr5ug

<u>4/26/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman ave rent - may 2024";...</u>	<u>May 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>5/31/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# tybhj734u</u>	<u>June 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>5/31/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman -june rent"; Conf#...</u>	<u>June 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>7/1/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# vt73oxeo4</u>	<u>July 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>7/1/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman-july rent"; Conf#...</u>	<u>July 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>8/1/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# zmx4bqe3</u>	<u>August 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>8/1/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman - August rent"; Conf#...</u>	<u>August 2024 Rent</u>	<u>\$ 1,250.00</u>
<u>9/3/2024</u>	<u>Zelle payment from JAMES BURBANK Conf# vipl8j3m6</u>	<u>September 2024 Rent</u>	<u>\$ 2,000.00</u>
<u>9/3/2024</u>	<u>Zelle payment from JENNIFER BARREDA for "518 stoneman - september rent"; Conf#...</u>	<u>September 2024 Rent</u>	<u>\$ 1,250.00</u>