

1 ANTHONY MARINACCIO (SBN 259335)
2 ISAAC GUZMAN (SBN 337062)
3 MARINACCIO LAW
4 225 W. Broadway, Suite 103
5 Glendale, CA 91204
6 Tel.: (818) 839-5220
7 Fax: (818) 638-9485
8 E-mail: anthony@marinacciolaw.com

9 Attorney for Plaintiffs: Bradford M. Martinez, Vicki L. Martinez, and Gail Diane Calhoun AKA
10 Gail Diane Houser

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**
14

15 BRADFORD M. MARTINEZ, VICKI L.
16 MARTINEZ, AND GAIL DIANE CALHOUN
17 AKA GAIL DIANE HOUSER,

18 Plaintiffs,

19 vs

20 JENNIFER BURBANK AND JAMES
21 BURBANK,

22 Defendants.

Case No. 25PDUD00999

[Assigned for All Purposes to the Hon. Jerry
B. Marshak, Dept. R]

**PLAINTIFF'S REQUEST FOR SPECIAL
INTERROGATORIES TO DEFENDANT
JAMES BURBANK (SET NO. 1)**

PROPOUNDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

RESPONDING PARTY: DEFENDANT, JAMES BURBANK

SET NO: One

PLEASE TAKE NOTICE that BRADFORD M. Martinez, ("Propounding Party") hereby
requests that you respond to the following Special Interrogatories separately and fully, in writing,
and under oath pursuant to Code of Civil Procedure § 2030.010, *et seq.*, within 5 days hereof.

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DEFINITIONS

1. The word “YOU,” “YOUR” “YOURS,” and “YOURSELF” shall each refer to Defendant, Jennifer Burbank, including Jennifer Burbank’s past and present agents, representatives, assigns, and anyone directing Jennifer Burbank’s actions in the matter bearing case number 25PDUD00999 (“ACTION”).
2. The phrase “PROPOUNDING PARTY” shall mean Plaintiff, BRADFORD M. MARTINEZ, and shall include any of BRADFORD M. MARTINEZ’s representatives, employees, agents, or assigns as well as any parties directing BRADFORD M. MARTINEZ’s actions in this ACTION.
3. The word “COMMUNICATIONS” shall mean any document, oral statement, meeting or conference, formal or informal, at any time or place and under any circumstances whatsoever, whereby information of any nature was stated, written, recorded or in any matter transmitted or transferred.
4. The word “DOCUMENT” and “DOCUMENTS” shall mean any and all “writings,” as the term is defined in California Evidence Code Section 250 and California Code of Civil Procedure Section 2031.010, including, but not limited to any tangible items which contain handwriting, typewriting, printing, photostatic reproduction, photographic reproduction, electronic reproduction, and any other form of communications or representations whether produced, reproduced, or stored on paper, cards, tapes, discs, belts, charts, films (including microfilm or microfiche), computer storage devices or any other medium or recordation that are in YOUR possession, custody or control, or the possession, custody, or control of any of YOUR agents, attorneys, accountants, or representatives.
5. The word “PERSON” or “PERSONS” is defined consistent with California Evidence Code Section 175 and shall mean and include any natural person, corporation, partnership, sole proprietorship, organization, association, federation, governmental entity or association, or any other kind of entity.

- 1 6. The terms “CONCERNING” and “REGARDING” means relating to, referring to,
2 describing, evidencing, or constituting.
- 3 7. The term “SUPPORT” means to provide a factual or evidentiary basis for a claim,
4 assertion, or legal position.
- 5 8. The phrase “PROPOUNDING PARTY” shall mean Defendant, Amanda Broadwell,
6 and shall include any of Amanda Broadwell’s representatives, employees, agents, or
7 assigns as well as any parties directing Amanda Broadwell’s actions in this ACTION.
- 8 9. The word “COMPLAINT” shall mean the ACTION’s underlying Complaint that
9 Plaintiff filed on or about April 1, 2025, in the Superior Court of California, for the
10 County of Los Angeles.
- 11 10. The word “NOTICE” shall mean the 60 – Day Notice to quit which was attached to the
12 complaint as exhibit 2 dated January 29, 2025.
- 13 11. The word “LEASE” shall mean the Residential Lease or Month-to-Month Rental
14 Agreement, bearing a commencement date of September 8, 2023 pursuant to which
15 YOU occupy the PREMISES. Attached hereto as Exhibit 1 is a true and correct copy of
16 the LEASE.
- 17 12. The word “RENT” shall mean the amount of money due monthly from YOU in
18 exchange for which YOU are granted the right to occupy the PREMISES that are the
19 subject of this ACTION.
- 20 13. The term “PREMISES” shall mean the real property commonly known as 518 North
21 Stoneman Avenue, Alhambra CA 91801.
- 22 14. The term “REPAIRS” shall mean any work to correct, change, clean, ameliorate, or
23 otherwise fix the PREMISES.
- 24 15. The term “HABITABILITY” shall mean the physical condition of a residential living
25 space, including but not limited to, the condition of doors and walls, the accumulation
26 of mold, and infestation of vermin and rodents.
- 27 16. The terms “all,” “any,” and “each” shall be construed as encompassing any and all.
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1 17. The connectives “and” and “or” shall be construed either disjunctively or conjunctively
2 as necessary to bring within the scope of the discovery request all responses that might
3 otherwise be construed to be outside of its scope.

4 18. The use of the singular form of any word includes the plural and *vice versa*.

5 19. All definitions construed herein will retain their meaning irrespective of whether they
6 are capitalized in the requests below.

7 **SPECIAL INTERROGATORIES**

8 **SPECIAL INTERROGATORY NO. 1**

9 DESCRIBE all DOCUMENTS that support YOUR contention in YOUR ANSWER that,
10 “Plaintiff waived, changed, or canceled the notice to quit.”

11 **SPECIAL INTERROGATORY NO. 2**

12 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff served
13 Defendant with the notice to quit or filed the complaint to retaliate against Defendant.”

14 **SPECIAL INTERROGATORY NO. 3**

15 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff’s demand
16 for possession violates the local rent control or eviction control ordinance of [...] Tenant
17 Protection Ordinance of 2019.”

18 **SPECIAL INTERROGATORY NO. 4**

19 DESCRIBE all DOCUMENTS that support YOUR contention that “Plaintiff failed to
20 state a just cause for termination of tenancy in the written notice to terminate.”

21 **SPECIAL INTERROGATORY NO. 5**

22 DESCRIBE all DOCUMENTS that support YOUR contention that Plaintiff failed to
23 comply with the relocation assistance requirements of Civil Code section 1946.2(d).

24 **SPECIAL INTERROGATORY NO. 6**

25 DESCRIBE all DOCUMENTS that support YOUR contention that, “Plaintiff violated
26 the Tenant Protection Act in a manner that defeats the complaint.”

27 **SPECIAL INTERROGATORY NO. 7**

1 DESCRIBE all DOCUMENTS that support YOUR contention that, “Defendants
2 submitted multiple habitability-related complaints [...] including complaints about persistent
3 water intrusion in the garage area [...]”

4 **SPECIAL INTERROGATORY NO. 8**

5 “Defendants submitted multiple habitability-related complaints [...] including complaints
6 about persistent water intrusion in the garage area [...] remains unresolved.”

7 **SPECIAL INTERROGATORY NO. 9**

8 DESCRIBE all DOCUMENTS that support YOUR response to the Form Interrogatories-
9 General Set One.

10 **SPECIAL INTERROGATORY NO. 10**

11 DESCRIBE all DOCUMENTS that support YOUR responses to the Requests for
12 Admissions Set One.

13 **SPECIAL INTERROGATORY NO. 11**

14 DESCRIBE all DOCUMENTS that DESCRIBE PERSONS YOU will call as witnesses
15 during trial in this ACTION.

16 **SPECIAL INTERROGATORY NO. 12**

17 DESCRIBE all exhibits YOU intend to introduce at trial in this ACTION.

18 **SPECIAL INTERROGATORY NO. 13**

19 IDENTIFY all DOCUMENTS YOU intend to use as an exhibit at trial in this ACTION.

20 **SPECIAL INTERROGATORY NO. 14**

21 IDENTIFY all facts that support any defense to the COMPLAINT.

22 **SPECIAL INTERROGATORY NO. 15**

23 IDENTIFY all PERSONS with knowledge of any defenses YOU allege to the
24 COMPLAINT.

25 **SPECIAL INTERROGATORY NO. 16**

26 IDENTIFY each DOCUMENT which supports the affirmative defenses YOU claim to
27 have REGARDING this ACTION.

28 **SPECIAL INTERROGATORY NO. 17**

1 IDENTIFY all COMMUNICATIONS from October 2023 to the date of your response
2 between YOU and PLAINTIFF REGARDING any PERSON occupying the PREMISES.

3 **SPECIAL INTERROGATORY NO. 18**

4 IDENTIFY each payment of RENT REGARDING the PREMISES YOU made to any
5 PERSON from October 2023 to the date of your response.

6 **SPECIAL INTERROGATORY NO. 19**

7 IDENTIFY the circumstances by which YOU first received the NOTICE.

8 **SPECIAL INTERROGATORY NO. 20**

9 If YOU contend that any of the matters stated in the NOTICE are false, state each fact
10 which supports that contention.

11 **SPECIAL INTERROGATORY NO. 21**

12 If YOU contend that PLAINTIFF does not have just cause to evict you from the
13 PREMISES, state each fact which supports that contention.

14 **SPECIAL INTERROGATORY NO. 22**

15 EXPLAIN why RENT was not paid for the month of March 2025.

16 **SPECIAL INTERROGATORY NO. 23**

17 Is YOUR response to each request for admission served with these interrogatories an
18 unqualified admission? If not, for each response that is not:

19 (a) State the number of the request;

20 (b) State all supporting facts;

21 (c) Provide the names, addresses, and phone numbers of all PERSONS with knowledge
22 of those facts; and

23 (d) IDENTIFY all DOCUMENTS and tangible things that support your response and
24 who has them.

25 **SPECIAL INTERROGATORY NO. 24**

26 State whether YOU have ever provided written or oral notice to PLAINTIFF of any
27 alleged habitability issues REGARDING the PREMISES, and IDENTIFY the date, content, and
28 recipient of each such notice.

1 **SPECIAL INTERROGATORY NO. 25**

2 IDENTIFY all requests for repairs or maintenance from YOU to PLAINTIFF
3 REGARDING the PREMISES.

4 **SPECIAL INTERROGATORY NO. 26**

5 If YOU contend that any condition at the PREMISES justifies YOUR non-payment of
6 RENT, IDENTIFY each such condition.

7 **SPECIAL INTERROGATORY NO. 27**

8 IDENTIFY any agreements, verbal or written, between YOU and PLAINTIFF that
9 modify the LEASE, including the date and content of each agreement.

10 **SPECIAL INTERROGATORY NO. 28**

11 IDENTIFY all legal proceedings, prior or ongoing, REGARDING any unlawful detainer case in
12 which YOU have been a defendant.

13 **SPECIAL INTERROGATORY NO. 29**

14 IDENTIFY all PERSONS who have visited the PREMISES from October 2023 through
15 September 30, 2024, excluding PLAINTIFF or its agents.

16 **SPECIAL INTERROGATORY NO. 30**

17 IDENTIFY all PERSONS who have occupied the PREMISES from October 2023
18 through September 2024, excluding PLAINTIFF or its agents.

19
20 Dated: June 6, 2025

21 *Anthony Marinaccio*
22 ANTHONY MARINACCIO
23 Attorney for the Plaintiffs
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