

1 See Supplemental Response to Request for Admission No. 3. Deny, to the extent that the
2 e-mail bearing the subject "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801"
3 does not reference "modifying bathroom." Admit, to the extent that the e-mail bearing the subject
4 "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801" references "pet." Discovery
5 is ongoing and it is anticipated that additional discovery and further investigation, legal research
6 and analysis will supply additional facts and provide new and different meaning to known facts,
7 and may establish new factual conclusions and legal contentions, all of which may result in
8 additional changes and/or variations from the responses set herein and Responding Party reserves
9 the right to supplement this response at a later time as appropriate, up to and including at trial.
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11 **REQUEST FOR ADMISSION NO. 5:**
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13 Admit that the June 19, 2024 notice of non-renewal did not state that PLAINTIFF or
14 PLAINTIFF's relative intended to move into the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 5**
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17 As part of this meet and confer process, Responding Party requests that Propounding Party
18 define the term "notice of non-renewal," "relative." Notwithstanding and without waiving the
19 foregoing objections, Responding Party responds as follows:

20 See Supplemental Response to Request for Admission Nos. 3-4. Admit, to the extent that
21 the e-mail bearing the subject "Lease Termination of 518 N. Stoneman Ave. Alhambra CA 91801"
22 does not reference "relative." Discovery is ongoing and it is anticipated that additional discovery
23 and further investigation, legal research and analysis will supply additional facts and provide new
24 and different meaning to known facts, and may establish new factual conclusions and legal
25 contentions, all of which may result in additional changes and/or variations from the responses set
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1 herein and Responding Party reserves the right to supplement this response at a later time as
2 appropriate, up to and including at trial.

3 **REQUEST FOR ADMISSION NO. 6:**

4 Admit that the NOTICE served on or about January 30, 2025, was the first written
5 communication to DEFENDANT stating that Robert L. Fernandez intended to occupy the
6 PREMISES.
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8 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 6**

9 As part of this meet and confer process, Responding Party requests that Propounding Party
10 provide a copy of the referenced NOTICE. Notwithstanding and without waiving the foregoing
11 objections, Responding Party responds as follows:
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13 Responding Party made a reasonable inquiry and the information it knows or can readily
14 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
15 additional discovery and further investigation, legal research and analysis will supply additional
16 facts and provide new and different meaning to known facts, and may establish new factual
17 conclusions and legal contentions, all of which may result in additional changes and/or variations
18 from the responses set herein and Responding Party reserves the right to supplement this response
19 at a later time as appropriate, up to and including at trial.
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21 **REQUEST FOR ADMISSION NO. 7**

22 Admit that DEFENDANT submitted written REPAIR REQUESTS to PLAINTIFF or the
23 PROPERTY MANAGER in September 2024 concerning water intrusion at the PREMISES.
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25 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 7**

26 As part of this meet and confer process, Responding Party requests that Propounding Party
27 define the term “written,” “concerning,” “water intrusion.” Given that this request is compound,
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1 Responding Party requests that Propounding Party separate this request into distinct questions.
2 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
3 follows:

4 Responding Party made a reasonable inquiry and the information it knows or can readily
5 obtain is insufficient to enable it to admit or deny with respect to the PROPERTY MANAGER.
6 Deny, with respect to the PLAINTIFF. 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 and
9 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 later
11 time as appropriate, up to and including at trial.

12 **REQUEST FOR ADMISSION NO. 8:**

13 Admit that DEFENDANT submitted additional REPAIR REQUESTS between December
14 2024 and January 2025 concerning unresolved issues at the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 8**

16 As part of this meet and confer process, Responding Party requests that Propounding Party
17 define the term “additional,” “concerning,” “unresolved issues.” Notwithstanding and without
18 waiving the foregoing objections, Responding Party responds as follows:

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

3 **REQUEST FOR ADMISSION NO. 9:**

4 Admit that PLAINTIFF did not complete REPAIRS to address water intrusion at the
5 PREMISES before serving the NOTICE.
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7 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 9**

8 As part of this meet and confer process, Responding Party requests that Propounding Party
9 define the term “complete,” “water intrusion.” Notwithstanding and without waiving the foregoing
10 objections, Responding Party responds as follows:
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12 To the extent Responding Party indicated in the documents attached hereto or sent
13 concurrently with these supplemental responses, Admit. Responding Party made a reasonable
14 inquiry and the information it knows or can readily obtain is insufficient to enable it to admit or
15 deny. Discovery is ongoing and it is anticipated that additional discovery and further investigation,
16 legal research and analysis will supply additional facts and provide new and different meaning to
17 known facts, and may establish new factual conclusions and legal contentions, all of which may
18 result in additional changes and/or variations from the responses set herein and Responding Party
19 reserves the right to supplement this response at a later time as appropriate, up to and including at
20 trial.
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22 **REQUEST FOR ADMISSION NO. 10:**

23 Admit that DEFENDANT submitted a COMPLAINT to the California Civil Rights
24 Department in or about September 2024 regarding the condition of the PREMISES.
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1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 10**

2 As part of this meet and confer process, Responding Party requests that Propounding Party
3 define the term “submitted,” “regarding,” “condition.” Notwithstanding and without waiving the
4 foregoing objections, Responding Party responds as follows:
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6 Deny. Discovery is ongoing and it is anticipated that additional discovery and further
7 investigation, legal research and analysis will supply additional facts and provide new and different
8 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
9 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.
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13 **REQUEST FOR ADMISSION NO. 11:**

14 Admit that DEFENDANT submitted a COMPLAINT to the Los Angeles County
15 Department of Public Health in or about October 2024 regarding the condition of the PREMISES.
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17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 11**

18 As part of this meet and confer process, Responding Party requests that Propounding Party
19 define the term “submitted “regarding,” “condition.” Notwithstanding and without waiving the
20 foregoing objections, Responding Party responds as follows:
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22 Deny. Discovery is ongoing and it is anticipated that additional discovery and further
23 investigation, legal research and analysis will supply additional facts and provide new and different
24 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
25 which may result in additional changes and/or variations from the responses set herein and
26 Responding Party reserves the right to supplement this response at a later time as appropriate, up
27 to and including at trial.
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