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

13 BRADFORD M. MARTINEZ; VICKI L.) CASE NO. 25PDUD00999
14 MARTINEZ; GAIL DIANE CALHOUN)
15 AKA GAIL DIANE HOUSER) [Assigned for all purposes to the Hon.
16 Plaintiffs,) Jerry B. Marshak, Dept. R]
17)

18 v.) **PLAINTIFF'S RESPONSE TO**
19) **REQUEST FOR ADMISSIONS**

20 JENNIFER BURBANK; JAMES)
21 BURBANK) Complaint Filed: April 1, 2025
22 Defendants,) Trial Date: June 3, 2025
23)
24)

25 PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

26 RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

27 SET NO.: One

28 BRADFORD M. MARTINEZ ("Responding Party") hereby provides its response to
JENNIFER BURBANK'S ("Propounding Party") Requests for Admission (Set One) as follows:

PRELIMINARY STATEMENT

These responses are made only for the purpose of the within action. Each response or
answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility

1 and any other objections and grounds that would require the exclusion of any statement herein if
2 any document was asked of, or if any statement contained therein were made by a witness present
3 and testifying in court, all of which objections and grounds are reserved and may be interposed at
4 the time of trial.

5
6 Plaintiff is Responding to all Requests to the extent that information has become known
7 by it. However, this Responding Party's discovery, investigation and preparation for trial of this
8 matter has not been completed as of the date of these responses, and, therefore, Plaintiff does not
9 purport to state anything more than information presently known and discovered by it.

10
11 Plaintiff, in responding to these Requests, reserves the right to continue discovery and
12 investigation in this matter for facts, witnesses and supporting data that may recall information
13 which, if it had presently within its knowledge, would be included in these responses. For example,
14 to the extent that any request calls for the identification of all documents," it is responded to fully
15 insofar as information is presently available to Plaintiff, and Plaintiff is not precluded from
16 presenting at trial information discovered after the date of the response of this request.

17
18 This preliminary statement is incorporated into each of the responses set forth below.

19 **GENERAL OBJECTIONS**

20 To avoid repetition in setting forth specific objections to interrogatories, Responding Party
21 sets forth and incorporates the following objections to Responding Party's each and every
22 response.

23 24 A. RELEVANCY OBJECTION

25 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks the
26 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
27 calculated to lead to the discovery of admissible evidence.
28

1 B. CONFIDENTIALITY/PRIVACY OBJECTION

2 Responding Party objects on the basis that the interrogatory seeks the disclosure of confidential
3 information and constitutes an attempt to invade the personal and/or financial privacy of certain
4 individuals or persons.
5

6 C. OVERBREADTH AND BURDEN OBJECTION

7 Responding Party objects on the basis that the interrogatory is overbroad, burdensome and
8 oppressive in that they seek the disclosure of information that has little or no practical benefit to
9 Propounding Party while placing an unwarranted burden or expense on the Responding Party in
10 ascertaining such information. Further, such interrogatory is so broadly drawn that although it
11 may include some relevant information within its scope, it includes information that is irrelevant
12 or immaterial to the instant action. Such interrogatory seeks information which is cumulative
13 and/or would require the compilation of extensive and detailed information from numerous
14 potential sources, many of which is not easily identifiable or available. A search for all such
15 information will in many instances involve enormous amounts of time by Responding Party.
16
17 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.
18

19 D. AMBIGUITY OBJECTION

20 Responding Party objects on the basis that the interrogatory is phrased in language that is
21 vague, ambiguous, and uncertain such that Responding Party is unable to ascertain what
22 information is sought and in order to respond to this interrogatory, Responding Party would have
23 to speculate as to Propounding Party's intended meaning.
24

25 E. AVAILABILITY OBJECTION

26 Responding Party objects on the basis that the interrogatory is equally accessible to all parties
27 or is more accessible to the Propounding Party or which is maintained primarily by persons or
28

1 entities other than Responding Party.

2 F. IMPROPER FORM OBJECTION

3 Responding Party objects on the basis that the interrogatory is phrased in improper form
4 because the interrogatory is not “full and complete in and of itself”; or because it contains subpart,
5 “compound, conjunctive or disjunctive” question, such that the interrogatory does not comply with
6 the requirements of *California Code of Civil Procedure* §2030.060

8 G. LEGAL CONCLUSION OBJECTION

9 Responding Party objects on the basis that the interrogatory calls for a legal conclusion.

11 H. ATTORNEY WORK-PRODUCT OBJECTION

12 Responding Party objects on the basis that the interrogatory, in whole or in part,
13 seeks disclosure of information that is protected under the attorney work-product doctrine.

15 I. MARITAL PRIVILEGE OBJECTION

16 Responding Party objects on the basis that the request, in whole or in part, seeks
17 disclosure of information that is protected under marital privilege.

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

19 Admit that PLAINTIFF is not the owner of the PROPERTY.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 1**

22 Deny.

23 **REQUEST FOR ADMISSION NO. 2:**

24 Admit that prior to June 2024, PLAINTIFF had not informed DEFENDANT of any intent
25 to recover possession of the PREMISES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 2**

1 Responding Party objects to this request on the grounds that it is vague and ambiguous
2 regarding the term “recover possession.” Responding Party objects to this request on the grounds
3 that it is not reasonably limited in scope or time. Additionally, this request is not reasonably
4 calculated to lead to the discovery of admissible or relevant evidence and it is overbroad,
5 burdensome, and oppressive and is only designed to harass Responding Party. Notwithstanding
6 and without waiving the foregoing objections, Responding Party responds as follows:
7

8 Responding Party made a reasonable inquiry and the information it knows or can readily
9 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
10 additional discovery and further investigation, legal research and analysis will supply additional
11 facts and provide new and different meaning to known facts, and may establish new factual
12 conclusions and legal contentions, all of which may result in additional changes and/or variations
13 from the responses set herein and Responding Party reserves the right to supplement this response
14 at a later time as appropriate, up to and including at trial.

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

16 Admit that on or about June 19, 2024, PLAINTIFF served DEFENDANT with a notice of
17 non-renewal of the RENTAL AGREEMENT.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 3**

19 Responding Party objects to this request on the grounds that it is vague and ambiguous
20 regarding the term “served,” “notice of non-renewal.” Responding Party objects to this request on
21 the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the
22 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressive and
23 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
24 objections, Responding Party responds as follows:
25

26 Responding Party is unable to comply with this request as propounded. Responding Party
27 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
28