

1 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the
2 Los Angeles County Department of Public Health before serving the NOTICE.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 16**

4 Responding Party objects to this request on the grounds that it is vague and ambiguous
5 regarding the term “knowledge.” Responding Party objects to this request on the grounds that it is
6 vague and ambiguous regarding the term “COMPLAINT” as the term is defined by Propounding
7 Party but used in this request. Responding Party objects to this request on the grounds that it is not
8 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible
9 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
10 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
11 objections, Responding Party responds as follows:
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14 Responding Party is unable to comply with this request as propounded. Responding Party
15 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
16 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
17 further investigation, legal research and analysis will supply additional facts and provide new and
18 different meaning to known facts, and may establish new factual conclusions and legal contentions,
19 all of which may result in additional changes and/or variations from the responses set herein and
20 Responding Party reserves the right to supplement this response at a later time as appropriate, up
21 to and including at trial.
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24 **REQUEST FOR ADMISSION NO. 17:**

25 Admit that no DOCUMENT served by PLAINTIFF prior to January 30, 2025, referenced
26 any intention by Robert L. Fernandez to move into the PREMISES.
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28 **RESPONSE TO REQUEST FOR ADMISSION NO. 17**

1 Responding Party objects to this request on the grounds that it is vague and ambiguous
2 regarding the term “no DOCUMENT,” “any intention.” Responding Party objects to this request
3 on the grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead
4 to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and
5 oppressing and is only designed to harass Responding Party. Notwithstanding and without waiving
6 the foregoing objections, Responding Party responds as follows:
7

8 Responding Party is unable to comply with this request as propounded. Responding Party
9 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
10 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
11 further investigation, legal research and analysis will supply additional facts and provide new and
12 different meaning to known facts, and may establish new factual conclusions and legal contentions,
13 all of which may result in additional changes and/or variations from the responses set herein and
14 Responding Party reserves the right to supplement this response at a later time as appropriate, up
15 to and including at trial.
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18 **REQUEST FOR ADMISSION NO. 18:**

19 Admit that the reasons given in the June 2024 non renewal notice are different from the
20 reasons given in the January 2025 NOTICE.
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22 **RESPONSE TO REQUEST FOR ADMISSION NO. 18**

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

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

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13 **REQUEST FOR ADMISSION NO. 19:**

14 Admit that DEFENDANT was in possession of the PREMISES for more than three years
15 before the NOTICE was served.

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17 **RESPONSE TO REQUEST FOR ADMISSION NO. 19**

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

24
25 Deny, to the extent of the term listed in the underlying lease for the PREMISES. Discovery
26 is ongoing and it is anticipated that additional discovery and further investigation, legal research
27 and analysis will supply additional facts and provide new and different meaning to known facts,
28

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

4 **REQUEST FOR ADMISSION NO. 20:**

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6 Admit that PLAINTIFF has not produced any DOCUMENT confirming a scheduled
7 move-in date for Robert L. Fernandez.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 20**

9 Responding Party objects to this request on the grounds that it is vague and ambiguous
10 regarding the term “produced,” “confirming.” Responding Party objects to this request on the
11 grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead to the
12 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
13 is only designed to harass Responding Party. As phrased, it is unclear to whom this request
14 concerns with respect to referenced production. Notwithstanding and without waiving the
15 foregoing objections, Responding Party responds as follows:
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18 Responding Party is unable to comply with this request as propounded. Responding Party
19 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
20 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
21 further investigation, legal research and analysis will supply additional facts and provide new and
22 different meaning to known facts, and may establish new factual conclusions and legal contentions,
23 all of which may result in additional changes and/or variations from the responses set herein and
24 Responding Party reserves the right to supplement this response at a later time as appropriate, up
25 to and including at trial.
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RESPONSE TO REQUEST FOR ADMISSION NO. 21

Admit.

RESPONSE TO REQUEST FOR ADMISSION NO. 22

Responding Party objects to this request on the grounds that it is vague and ambiguous regarding the term “assisted living facility.” Responding Party objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressive and is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing objections, Responding Party responds as follows: Deny.

MARINACCIO LAW

BY: /S/

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