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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
PASADENA SUPERIOR COURT**

**BRADFORD M. MARTINEZ, VICKI L.
MARTINEZ AND GAIL DIANE
CALHOUN AKA GAIL DIANE HOUSER**

Plaintiff,

vs.

**JENNIFER BURBANK AND JAMES
BURBANK**

Defendant

Case No.: 25PDUD00999

**DEFENDANT JENNIFER BURBANK'S
REQUEST FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF
BRADFORD M. MARTINEZ**

PROPOUNDING PARTY: JENNIFER BURBANK
RESPONDING PARTY: BRADFORD M. MARTINEZ
SET NUMBER: 1

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure sections 2031.010 through 2031.060, Defendant Jennifer Burbank (hereafter "Defendant") hereby requests that Bradford M. Martinez, Vicki L. Martinez and Gail Diane Calhoun AKA Gail Diane Houser (hereafter "Plaintiff"), produce the following documents for inspection and copying within five days of service hereof, or as otherwise prescribed by law (Civ. Proc. Code, §§ 2031.010-2031.060, § 1170.8). Each request must be responded to fully and separately, in writing, under oath (Civ. Proc. Code, § 2031.210, subd. (a)) to Dagmawi Teshale, Esq at Teshale Law, PC to

1 the following address: 5150 E. Pacific Coast Hwy, Ste 200, Long Beach, CA 90804, or via email
2 to Dteshale@teshalelaw.com

3 If you are unable to comply with any particular request, you must state the reason for
4 your inability to comply. The response shall affirm that a diligent search and a reasonable inquiry
5 has been made in an effort to comply with that demand (Civ. Proc. Code, § 2031.230). If you
6 object to any request, the objection shall state forth the extent of, and the specific grounds for the
7 objection. (Civ. Proc. Code, § 2031.240, subd. (b)). If you claim that any documents are
8 privileged or otherwise protected, you must provide sufficient factual information for other
9 parties to evaluate the applicability and merits of that privilege or protection (Civ. Proc. Code, §
10 2031.240, subd. (c)).

13 For any documents requested, Defendant is agreeable to receiving true and correct
14 photocopies where producing originals is too burdensome or unnecessary.

- 16 1. The term "APARTMENT COMPLEX" shall mean any residential building or group of
17 buildings within a contiguous or non-contiguous property, managed or owned by the
18 same entity or individual, which contains multiple individual housing units available for
19 rent or lease to tenants. This definition includes, but is not limited to, any associated
20 common areas, facilities, and amenities provided for the use of the tenants residing within
21 such units.
- 22 2. The term "CASH PAYMENT" means any PAYMENT made in currency, directly from
23 the DEFENDANT to the landlord, without the use of checks or electronic transfers.
- 24 3. The term "CASE" means the Court Case associated with the following Case Number
25 25PDUD00999.
- 26 4. The term "COMPLAINTS" refers to any grievances or issues raised by the
27 DEFENDANT regarding the condition or management of the rental PROPERTY and/or
28 APARTMENT COMPLEX.

- 1 5. The term “CONCERNING” means referring to, relating to, supporting, describing,
2 reflecting, constituting, or in any other way referencing.
- 3 6. The term “DEFENDANT” or “DEFENDANTS” means the named Defendant(s) in this
4 CASE.
- 5 7. The term "DEFECTIVE OR HAZARDOUS CONDITIONS" refers to any conditions that
6 make the property unfit for habitation or pose a risk to health and safety, including but
7 not limited to those specified in California Civil Code § 1941.1 and Health and Safety
8 Code § 17920.3(a) & (b).
- 9 8. The term “DOCUMENT” means handwriting, typewriting, printing, photostating,
10 photographing, photocopying, transmitting by electronic mail or facsimile, and every
11 other means of recording upon any tangible thing, any form of communication or
12 representation, including letters, words, pictures, sounds, or symbols, or combinations
13 thereof, and any record thereby created, regardless of the manner in which the record has
14 been stored.
- 15 9. The term “IDENTIFY” means to state the name, address, and telephone number of the
16 person, or, if a company or entity, the name of the organization; and if a DOCUMENT,
17 then provide a description of the document and identify its current custodian.
- 18 10. The term "INSPECTIONS" means any examinations or assessments of the rental
19 property conducted by the landlord, PROPERTY MANAGER, or government agencies
20 during the DEFENDANT'S TENANCY.
- 21 11. The term "LEGAL ACTIONS" refers to any lawsuits, claims, or legal proceedings
22 initiated or faced by the DEFENDANT related to the TENANCY.
- 23 12. The term "REPAIR REQUESTS" means any communications or requests made by the
24 DEFENDANT to PLAINTIFF regarding the need for REPAIRS or upkeep of the rental
25 property.
- 26 13. The term "NON-PAYMENT" refers to the failure of the DEFENDANT to make the
27 required RENT or other PAYMENTS as specified in the RENTAL AGREEMENT.
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- 1 14. The term “NOTICE” means the notice which PLAINTIFF attached as Exhibit “2” to its
2 complaint in this CASE.
- 3 15. The term "JCO" refers to the Los Angeles Just Cause Ordinance, Los Angeles Municipal
4 Code (LAMC) § 151.00 et seq. and any amendments thereto.
- 5 16. The term "SCEP FEES" refers to the Systematic Code Enforcement Program fees
6 required under LAMC § 161.352.
- 7 17. The term “NOTICE OF VIOLATION” refers to any citation or notice of violation, or
8 substandard order from a government agency sent to PLAINTIFF.
- 9 18. The term "PAYMENTS" refers to any form of financial transactions made by the
10 DEFENDANT to PLAINTIFF, including rent and other fees as specified in the RENTAL
11 AGREEMENT.
- 12 19. The term "PROTECTED ACTIVITY" refers to any action taken by DEFENDANT that is
13 legally protected under California law, including requesting repairs, reporting habitability
14 violations, asserting rights under the JCO, or using a lawful source of income to pay rent.
- 15 20. The term “PERSONS” includes any natural person, firm, association, organization,
16 partnership, business, trust, corporation, or public entity involved in the context of the
17 interrogatories.
- 18 21. The term “PLAINTIFF” or “PLAINTIFFS” means the named Plaintiffs in this CASE and
19 any and all other persons or entities with any ownership in the PREMISES, as well as
20 PLAINTIFF’s agents, employees, relatives, attorneys, and anyone acting on their behalf.
- 21 22. The term "PREMISES" or "PROPERTY" refers to the house, room, or unit that
22 DEFENDANT occupies and for which possession is in dispute in this CASE.
- 23 23. The term "PROPERTY MANAGER" means any individual or company responsible for
24 managing the rental property on behalf of the landlord.
- 25 24. The term "PROPERTY MAINTENANCE" means any activities undertaken to preserve,
26 repair, or improve the rental property during the DEFENDANT'S TENANCY.
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- 1 25. The term "RENT" refers to the periodic payment that the DEFENDANT is required to
2 pay to the landlord as stipulated in the RENTAL AGREEMENT.
- 3 26. The term "RENT COLLECTION" refers to the process of collecting RENT from the
4 DEFENDANT by the landlord or PROPERTY MANAGER.
- 5 27. The term "RENTAL AGREEMENT" means any written or verbal agreement, contract, or
6 lease between the landlord and tenant outlining the terms and conditions of the tenancy,
7 including the rent amount, payment schedule, and responsibilities of both parties.
- 8 28. The term "REPAIRS" refers to any actions taken to fix, restore, repair, or maintain
9 PREMISES.
- 10 29. The term "TENANCY" means the period and terms under which the DEFENDANT
11 occupies or occupied the rental property under the RENTAL AGREEMENT.
- 12 30. Unless referred to specifically by name, the terms "YOU", "YOUR" or "YOURS" mean
13 PLAINTIFF and all agents, employees, insurance agents and/or representatives,
14 investigators, or servants acting or purporting to act on behalf of PLAINTIFF.
- 15 31. Unless otherwise specified, the applicable time period for these interrogatories is the
16 period of the tenant's occupancy of the apartment(s), plus one month before such
17 occupancy and one month afterward if the TENANT has vacated.
- 18 32. The term "ASSISTED LIVING FACILITY" refers to any residence or facility that
19 provides personal care, supervision, and limited health-related services to individuals
20 who require assistance with activities of daily living, including but not limited to memory
21 care facilities, skilled nursing homes, or any full-time residential care facility for elderly
22 individuals.
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REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS that support YOUR contention that Robert L. Fernandez intends or intended to move into the PREMISES.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS referencing, signed by, or authored by Robert L. Fernandez CONCERNING his alleged intent to move into the PREMISES.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS relating to the physical condition or medical needs of Robert L. Fernandez between July 2024 and the present, including any DOCUMENTS reflecting his residency in any ASSISTED LIVING FACILITY.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS YOU relied upon in preparing, drafting, or serving the NOTICE.

REQUEST FOR PRODUCTION NO. 5:

All DOCUMENTS CONCERNING REPAIR REQUESTS made by DEFENDANT between September 2024 and January 2025.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS CONCERNING any response by PLAINTIFF or PROPERTY MANAGER to the REPAIR REQUESTS referenced in Request No. 5.

REQUEST FOR PRODUCTION NO. 7:

All DOCUMENTS CONCERNING water intrusion, moisture, mold, or plumbing issues at the PREMISES from September 2024 to the present.

REQUEST FOR PRODUCTION NO. 8:

All COMMUNICATIONS between PLAINTIFF and DEFENDANT between September 1, 2024, and January 30, 2025.

REQUEST FOR PRODUCTION NO. 9:

All DOCUMENTS reflecting any COMPLAINT, criticism, or statement made by PLAINTIFF

1 or PROPERTY MANAGER CONCERNING DEFENDANT’S habitability COMPLAINTS or
2 REPAIR REQUESTS.

3 **REQUEST FOR PRODUCTION NO. 10:**

4 All DOCUMENTS PLAINTIFF provided to any third party, including Robert L. Fernandez,
5 PROPERTY MANAGER, or legal counsel, CONCERNING DEFENDANT’S REPAIR
6 REQUESTS or habitability COMPLAINTS.

7 **REQUEST FOR PRODUCTION NO. 11:**

8 All DOCUMENTS CONCERNING the June 19, 2024 non-renewal notice served on
9 DEFENDANT.

10 **REQUEST FOR PRODUCTION NO. 12:**

11 All DOCUMENTS reflecting any determination by PLAINTIFF that the PREMISES was needed
12 for owner or relative occupancy prior to January 30, 2025.

13 **REQUEST FOR PRODUCTION NO. 13:**

14 All DOCUMENTS CONCERNING PLAINTIFF’S compliance or claimed exemption from the
15 Tenant Protection Act (Civil Code § 1946.2) in relation to this TENANCY.

16 **REQUEST FOR PRODUCTION NO. 14:**

17 All DOCUMENTS CONCERNING any COMMUNICATIONS between PLAINTIFF and any
18 government agency regarding DEFENDANT or the PREMISES.

19 **REQUEST FOR PRODUCTION NO. 15:**

20 All DOCUMENTS submitted to or received from the any government entity CONCERNING
21 DEFENDANT’S TENANCY.

22 **REQUEST FOR PRODUCTION NO. 16:**

23 All DOCUMENTS that PLAINTIFF intends to rely on at trial in this CASE.

24 **REQUEST FOR PRODUCTION NO. 17:**

25 All DOCUMENTS CONCERNING any INSPECTIONS conducted at the PREMISES from July
26 2024 to the present.
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REQUEST FOR PRODUCTION NO. 18:

All DOCUMENTS CONCERNING any legal advice or internal discussion about the decision to terminate DEFENDANT’S TENANCY between January 1, 2025, and January 30, 2025

REQUEST FOR PRODUCTION NO. 19:

All DOCUMENTS showing PAYMENTS received from the DEFENDANT from one (1) month prior to the commencement of DEFENDANT’S TENANCY until the present, including receipts, ledgers, and payment logs.

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS pertaining to RENTAL AGREEMENTS between PLAINTIFF and DEFENDANT.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS that establish PLAINTIFF’S ownership interest in the PREMISES, including but not limited to grant deeds, title reports, or recorded documents.

REQUEST FOR PRODUCTION NO. 22:

All DOCUMENTS that demonstrate PLAINTIFF had the legal right to recover possession of the PREMISES at the time the NOTICE was served.

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS CONCERNING the legal formation and current status of any entity that claims to own or manage the PREMISES.

REQUEST FOR PRODUCTION NO. 24:

All DOCUMENTS that reflect the name and legal identity of the PERSON or entity listed as the owner of record for the PREMISES with the Los Angeles County Assessor’s Office.

REQUEST FOR PRODUCTION NO. 25:

All DOCUMENTS reflecting any COMMUNICATIONS YOU received from the California Civil Rights Department (CRD) CONCERNING DEFENDANT or the PREMISES.

1 **REQUEST FOR PRODUCTION NO. 26:**

2 All DOCUMENTS reflecting any COMMUNICATIONS YOU sent to the California Civil
3 Rights Department (CRD) in response to a COMPLAINT made by DEFENDANT.

4 **REQUEST FOR PRODUCTION NO. 27:**

5 All DOCUMENTS reflecting any COMMUNICATIONS YOU received from the Los Angeles
6 County Department of Public Health CONCERNING DEFENDANT or the PREMISES.

7 **REQUEST FOR PRODUCTION NO. 28:**

8 All DOCUMENTS reflecting any COMMUNICATIONS YOU sent to the Los Angeles County
9 Department of Public Health in response to any complaint or inquiry involving the PREMISES
10 or DEFENDANT.
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14 Date: 5/20/2025

Respectfully,

15 *Dagmawi Teshale*

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Dagmawi Teshale
Attorney for Defendant
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At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 5150 E. Pacific Coast Hwy, Suite 200, Long Beach, CA 90804

on the interested parties in this action as follows:

_____ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and deposited the envelope in the ordinary course of business with the United States Postal Service, in a sealed envelope; with postage fully prepaid.

_____ **BY ELECTRONIC TRANSMISSION:** I transmitted a PDF version of this document by electronic mail to the party(s) identified on the attached service list using the e-mail address(es) indicated.

 X **BY OVERNIGHT DELIVERY:** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in the Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight

 X **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

____ (**Federal**): I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 20, 2025, in Long Beach, California.

Dagmawi Teshale

SERVICE LIST

Anthony Marinaccio

Marinaccio Law

225 W Broadway, Suite 103

Glendale, CA 91204

Phone: (818) 839-5220

Fax: (818) 638-9485

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ATTORNEY FOR THE PLAINTIFF

Bradford M. Martinez, Vicki L. Martinez and Gail Diane Calhoun AKA Gail Diane Houser