

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

7
8 **REQUEST FOR ADMISSION NO. 4:**

9 Admit that the June 19, 2024 notice of non-renewal stated that DEFENDANT had violated
10 the RENTAL AGREEMENT by allegedly modifying bathroom and keeping a pet.

11
12 **RESPONSE TO REQUEST FOR ADMISSION NO. 4**

13 Responding Party objects to this request on the grounds that it is vague and ambiguous
14 regarding the term “notice of non-renewal,” “modifying bathroom,” “pet.” Responding Party
15 objects to this request on the grounds that it is not reasonably calculated to lead to the discovery
16 of admissible or relevant evidence and it is overbroad, burdensome, and oppressive and is only
17 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
18 objections, Responding Party responds as follows:

19
20 Responding Party is unable to comply with this request as propounded. Responding Party
21 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
22 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
23 further investigation, legal research and analysis will supply additional facts and provide new and
24 different meaning to known facts, and may establish new factual conclusions and legal contentions,
25 all of 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. 5:**

4 Admit that the June 19, 2024 notice of non-renewal did not state that PLAINTIFF or
5 PLAINTIFF's relative intended to move into the PREMISES.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 5**

7
8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “notice of non-renewal,” “relative.” Responding Party objects to this request
10 on the grounds that it is not reasonably calculated to lead to the discovery of admissible or relevant
11 evidence and it is overbroad, burdensome, and oppressing and is only designed to harass
12 Responding Party. Notwithstanding and without waiving the foregoing objections, Responding
13 Party responds as follows:
14

15 Responding Party is unable to comply with this request as propounded. Responding Party
16 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
17 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
18 further investigation, legal research and analysis will supply additional facts and provide new and
19 different meaning to known facts, and may establish new factual conclusions and legal contentions,
20 all of which may result in additional changes and/or variations from the responses set herein and
21 Responding Party reserves the right to supplement this response at a later time as appropriate, up
22 to and including at trial.
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24

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

26 Admit that the NOTICE served on or about January 30, 2025, was the first written
27 communication to DEFENDANT stating that Robert L. Fernandez intended to occupy the
28

1 PREMISES.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 6**

3 Responding Party objects to this request on the grounds that it is vague and ambiguous
4 regarding the term “first written communication.” Responding Party objects to this request on the
5 grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the discovery
6 of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and is only
7 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
8 objections, Responding Party responds as follows:
9

10 Responding Party is unable to comply with this request as propounded. Responding Party
11 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
12 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
13 further investigation, legal research and analysis will supply additional facts and provide new and
14 different meaning to known facts, and may establish new factual conclusions and legal contentions,
15 all of which may result in additional changes and/or variations from the responses set herein and
16 Responding Party reserves the right to supplement this response at a later time as appropriate, up
17 to and including at trial.
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19
20 **REQUEST FOR ADMISSION NO. 7**

21 Admit that DEFENDANT submitted written REPAIR REQUESTS to PLAINTIFF or the
22 PROPERTY MANAGER in September 2024 concerning water intrusion at the PREMISES.
23

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 7**

25 Responding Party objects to this request on the grounds that it is vague and ambiguous
26 regarding the term “written,” “concerning,” “water intrusion.” Responding Party objects to this
27 request on the grounds that it is not reasonably limited in scope or time, not reasonably calculated
28

1 to lead to the discovery of admissible or relevant evidence and it is compound, overbroad,
2 burdensome, and oppressing and is only designed to harass Responding Party. Notwithstanding
3 and without waiving the foregoing objections, Responding Party responds as follows:

4 Responding Party is unable to comply with this request as propounded. Responding Party
5 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
6 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
7 further investigation, legal research and analysis will supply additional facts and provide new and
8 different meaning to known facts, and may establish new factual conclusions and legal contentions,
9 all of 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.

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

15 Admit that DEFENDANT submitted additional REPAIR REQUESTS between December
16 2024 and January 2025 concerning unresolved issues at the PREMISES.

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

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

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

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

7
8 **REQUEST FOR ADMISSION NO. 9:**

9 Admit that PLAINTIFF did not complete REPAIRS to address water intrusion at the
10 PREMISES before serving the NOTICE.

11
12 **RESPONSE TO REQUEST FOR ADMISSION NO. 9**

13 Responding Party objects to this request on the grounds that it is vague and ambiguous
14 regarding the term “complete,” “water intrusion.” Responding Party objects to this request on the
15 grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead to the
16 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
17 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
18 objections, Responding Party responds as follows:

19
20 Responding Party is unable to comply with this request as propounded. Responding Party
21 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
22 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
23 further investigation, legal research and analysis will supply additional facts and provide new and
24 different meaning to known facts, and may establish new factual conclusions and legal contentions,
25 all of which may result in additional changes and/or variations from the responses set herein and
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