

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

2 Admit that DEFENDANT followed up in writing with PLAINTIFF regarding REPAIRS
3 to the PREMISES on or about January 28, 2025.

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

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6 As part of this meet and confer process, Responding Party requests that Propounding Party
7 define the term “writing,” “regarding.” Notwithstanding and without waiving the foregoing
8 objections, Responding Party responds as follows:

9 Admit. Discovery is ongoing and it is anticipated that additional discovery and further
10 investigation, legal research and analysis will supply additional facts and provide new and different
11 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
12 which may result in additional changes and/or variations from the responses set herein and
13 Responding Party reserves the right to supplement this response at a later time as appropriate, up
14 to and including at trial.
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16 **REQUEST FOR ADMISSION NO. 13:**

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18 Admit that PLAINTIFF served the NOTICE within three days after DEFENDANT's
19 January 2025 follow-up communication requesting REPAIRS.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 13**

21 As part of this meet and confer process, Responding Party requests that Propounding Party
22 define the term “follow-up communication,” “requesting.” Responding Party requests that
23 Propounding Party specify which “DEFENDANT's January 2025 follow-up communication
24 requesting REPAIRS” is being referred to. Notwithstanding and without waiving the foregoing
25 objections, Responding Party responds as follows:
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1 Responding Party made a reasonable inquiry and the information it knows or can readily
2 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
3 additional discovery and further investigation, legal research and analysis will supply additional
4 facts and provide new and different meaning to known facts, and may establish new factual
5 conclusions and legal contentions, all of which may result in additional changes and/or variations
6 from the responses set herein and Responding Party reserves the right to supplement this response
7 at a later time as appropriate, up to and including at trial.

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

10 Admit that DEFENDANT's habitability-related COMPLAINTS and REPAIR REQUESTS
11 constitute PROTECTED ACTIVITY under California law.

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13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 14**

14 As part of this meet and confer process, Responding Party requests that Propounding Party
15 define the term "habitability-related," "California law." Given that this request is compound,
16 Responding Party requests that Propounding Party separate this request into distinct questions.
17 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
18 follows:

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20 Responding Party made a reasonable inquiry and the information it knows or can readily
21 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
22 additional discovery and further investigation, legal research and analysis will supply additional
23 facts and provide new and different meaning to known facts, and may establish new factual
24 conclusions and legal contentions, all of which may result in additional changes and/or variations
25 from the responses set herein and Responding Party reserves the right to supplement this response
26 at a later time as appropriate, up to and including at trial.
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1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the
3 California Civil Rights Department before serving the NOTICE.

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

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6 As part of this meet and confer process, Responding Party requests that Propounding Party
7 define the term “knowledge.” Responding Party also requests that Propounding Party define the
8 term “COMPLAINT,” as there appear to be inconsistencies in how the term is defined by
9 Propounding Party but used in this request. Notwithstanding and without waiving the foregoing
10 objections, Responding Party responds as follows:

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

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20 **REQUEST FOR ADMISSION NO. 16:**

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

23 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 16**

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25 As part of this meet and confer process, Responding Party requests that Propounding Party
26 define the term “knowledge.” Responding Party also requests that Propounding Party define the
27 term “COMPLAINT,” as there appear to be inconsistencies in how the term is defined by
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1 Propounding Party but used in this request. Notwithstanding and without waiving the foregoing
2 objections, Responding Party responds as follows:

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

13 Admit that no DOCUMENT served by PLAINTIFF prior to January 30, 2025, referenced
14 any intention by Robert L. Fernandez to move into the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 17**

16 Admit.
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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.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 18**

22 As part of this meet and confer process, Responding Party requests that Propounding Party
23 define the term “reasons,” “non-renewal notice.” Responding Party requests that Propounding
24 Party specify which “June 2024 non renewal notice” and “January 2025 NOTICE” are being
25 referred to. Notwithstanding and without waiving the foregoing objections, Responding Party
26 responds as follows:
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1 Responding Party made a reasonable inquiry and the information it knows or can readily
2 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
3 additional discovery and further investigation, legal research and analysis will supply additional
4 facts and provide new and different meaning to known facts, and may establish new factual
5 conclusions and legal contentions, all of which may result in additional changes and/or variations
6 from the responses set herein and Responding Party reserves the right to supplement this response
7 at a later time as appropriate, up to and including at trial.

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

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

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13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 19**

14 Deny.

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

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

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19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 20**

20 As part of this meet and confer process, Responding Party requests that Propounding Party
21 define the term “produced,” “confirming.” Responding Party also requests, that Propounding Party
22 specify whom this request concerns with respect to referenced production and who requested any
23 referenced production. Notwithstanding and without waiving the foregoing objections,
24 Responding Party responds as follows:

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26 Responding Party made a reasonable inquiry and the information it knows or can readily
27 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
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