

1 Responding Party reserves the right to supplement this response at a later time as appropriate, up
2 to and including at trial.

3 **SPECIAL INTERROGATORY NO. 24**

4 State whether YOU received any written communication from DEFENDANT between
5 January 25, 2025, and January 30, 2025.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 24**

7 As part of this meet and confer, Responding Party requests that Propounding Party define
8 the term “state,” “received,” “written communication.” Subject to the foregoing objections, and
9 without waiving them, Responding Party responds as follows:
10

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

17 **SPECIAL INTERROGATORY NO. 25**

18 If YOU received any written communication from DEFENDANT between January 25,
19 2025, and January 30, 2025, IDENTIFY the DOCUMENT and state the date it was received.

20 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 25**

21 As part of this meet and confer, Responding Party requests that Propounding Party define
22 the term “state,” “received,” “written communication.” Subject to the foregoing objections, and
23 without waiving them, Responding Party responds as follows:
24

25 Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
27 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
28 further investigation, legal research and analysis will supply additional facts and provide new and
different meaning to known facts, and may establish new factual conclusions and legal contentions.

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

4 **SPECIAL INTERROGATORY NO. 26**

5 State whether the NOTICE was prepared or served in response to any communication
6 from DEFENDANT regarding REPAIRS, water intrusion, or habitability.

7 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 26**

8 As part of this meet and confer, Responding Party requests that Propounding Party define
9 the term “state,” “water intrusion,” “any communication,” “habitability.” Because this request is
10 compound, Responding Party requests that Propounding Party break this request into separate
11 questions. Subject to the foregoing objections, and without waiving them, Responding Party
12 responds as follows:

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

19 **SPECIAL INTERROGATORY NO. 27**

20 State whether YOU believe that DEFENDANT'S habitability-related COMPLAINTS
21 were a motivating factor in YOUR decision to serve the NOTICE.

22 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 27**

23 As part of this meet and confer, Responding Party requests that Propounding Party define
24 the term “state,” “habitability-related.” Subject to the foregoing objections, and without waiving
25 them, Responding Party responds as follows:

26 No. Discovery is ongoing and it is anticipated that additional discovery and further
27 investigation, legal research and analysis will supply additional facts and provide new and different
28

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

5 **SPECIAL INTERROGATORY NO. 28**

6 IDENTIFY all PERSONS involved in the preparation, drafting, or service of the
7 NOTICE.
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9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 28**

10 As part of this meet and confer, Responding Party requests that Propounding Party define
11 the term “preparation,” “drafting.” Because this request is compound, Responding Party requests
12 that Propounding Party separate this request into separate questions. Subject to the foregoing
13 objections, and without waiving them, Responding Party responds as follows:

14 Responding Party exercises its right to produce writings under Code of Civil Procedure
15 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
16 concurrently herewith. 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.

22 **SPECIAL INTERROGATORY NO. 29**

23 State whether YOU or any PERSON acting on YOUR behalf made any statements
24 expressing frustration, concern, or annoyance about DEFENDANT'S REPAIR REQUESTS or
25 COMPLAINTS before the NOTICE was served.
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27 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 29**

28 As part of this meet and confer, Responding Party requests that Propounding Party define
the term “state,” “any statements,” “frustration,” “concern,” “annoyance.” Because this request is

1 compound, Responding Party also requests that Propounding Party separate this request into
2 separate questions. Subject to the foregoing objections, and without waiving them, Responding
3 Party responds as follows:

4 Not to Propounding Party's current knowledge. Discovery is ongoing and it is anticipated
5 that additional discovery and further investigation, legal research and analysis will supply
6 additional facts and provide new and different meaning to known facts, and may establish new
7 factual conclusions and legal contentions, all of which may result in additional changes and/or
8 variations from the responses set herein and Responding Party reserves the right to supplement
9 this response at a later time as appropriate, up to and including at trial.

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11 **SPECIAL INTERROGATORY NO. 30**

12 IDENTIFY all DOCUMENTS CONCERNING any complaints, comments, or statements
13 made by PLAINTIFF, PROPERTY MANAGER, or their agents CONCERNING
14 DEFENDANT'S REPAIR REQUESTS or COMPLAINTS made between September 2024 and
15 January 2025.

16 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 30**

17 As part of this meet and confer, Responding Party requests that Propounding Party define
18 the term "complaints," "comments," "statements," "agents." Because this request is compound,
19 Responding Party also requests that Propounding Party separate this request into separate
20 questions. Subject to the foregoing objections, and without waiving them, Responding Party
21 responds as follows:

22 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
23 with this request as propounded. Discovery is ongoing and it is anticipated that additional
24 discovery and further investigation, legal research and analysis will supply additional facts and
25 provide new and different meaning to known facts, and may establish new factual conclusions and
26 legal contentions, all of which may result in additional changes and/or variations from the
27 responses set herein and Responding Party reserves the right to supplement this response at a later
28 time as appropriate, up to and including at trial.

1 DATED: 6/6/2025

MARINACCIO LAW

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3 BY: Anthony Marinaccio

4 Anthony Marinaccio, Esq.
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6 L. Martinez, and Gail Diane Calhoun AKA Gail
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