

1 BRADFORD M. MARTINEZ ("Responding Party") hereby provides its supplemental
2 responses to JENNIFER BURBANK'S ("Propounding Party") Request for Production of
3 Documents (Set One) as follows:

4 **PRELIMINARY STATEMENT**

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6 These responses are made only for the purpose of the within action. Each response or
7 answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility
8 and any other objections and grounds that would require the exclusion of any statement herein if
9 any document was asked of, or if any statement contained therein were made by a witness present
10 and testifying in court, all of which objections and grounds are reserved and may be interposed at
11 the time of trial.

12
13 Defendant is responding to all Requests to the extent that information has become known
14 by him. However, this Responding Party's discovery, investigation and preparation for trial of
15 this matter has not been completed as of the date of these responses, and, therefore, Defendant
16 does not purport to state anything more than information presently known and discovered by him.

17
18 Defendant, in responding to these Requests, reserves the right to continue discovery and
19 investigation in this matter for facts, witnesses and supporting data that may recall information
20 which, if he had presently within his knowledge, would be included in these responses. For
21 example, to the extent that any request calls for the identification of "all documents," it is
22 responded to fully insofar as information is presently available to Defendant, and Defendant is not
23 precluded from presenting at trial information discovered after the date of the response of this
24 request.

25
26 This preliminary statement is incorporated into each of the responses set forth below.

27 **GENERAL OBJECTIONS**

1 To avoid repetition in setting forth specific objections to interrogatories, Responding Party
2 sets forth and incorporates the following objections to Responding Party's each and every
3 response.

4
5 A. RELEVANCE OBJECTION

6 Responding party objects on the basis that the interrogatory, in whole or in part, seeks the
7 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
8 calculated to lead to the discovery of admissible evidence.

9
10 B. CONFIDENTIALITY/PRIVACY OBJECTION

11 Responding party objects on the basis that the interrogatory seeks the disclosure of confidential
12 information and constitutes an attempt to invade the personal and/or financial privacy of certain
13 individuals or persons.

14
15 C. OVERBREADTH AND BURDEN OBJECTION

16 Responding party objects on the basis that the interrogatory is overbroad, burdensome and
17 oppressive in that they seek the disclosure of information that has little or no practical benefit to
18 Propounding Party while placing an unwarranted burden or expense on the Responding Party in
19 ascertaining such information. Further, such interrogatory is so broadly drawn that although it
20 may include some relevant information within its scope, it includes information that is irrelevant
21 or immaterial to the instant action. Such interrogatory seeks information which is cumulative
22 and/or would require the compilation of extensive and detailed information from numerous
23 potential sources, many of which is not easily identifiable or available. A search for all such
24 information will in many instances involve enormous amounts of time by Responding Party.
25 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.
26
27

28 D. AMBIGUITY OBJECTION

1 Responding party objects on the basis that the interrogatory is phrased in language that is
2 vague, ambiguous, and uncertain such that Responding Party is unable to ascertain what
3 information is sought and in order to respond to this interrogatory, Responding Party would have
4 to speculate as to Propounding Party's intended meaning.

5
6 E. AVAILABILITY OBJECTION

7 Responding party objects on the basis that the interrogatory is equally accessible to all parties
8 or is more accessible to the Propounding Party or which is maintained primarily by persons or
9 entities other than Responding Party.

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11 F. IMPROPER FORM OBJECTION

12 Responding party objects on the basis that the interrogatory is phrased in improper form
13 because the interrogatory is not "full and complete in and of itself"; or because it contains subpart,
14 "compound, conjunctive or disjunctive" question, such that the interrogatory does not comply with
15 the requirements of *California Code of Civil Procedure* §2030.060

16
17 G. LEGAL CONCLUSION OBJECTION

18 Responding party objects on the basis that the interrogatory calls for a legal conclusion.

19
20 H. ATTORNEY WORK-PRODUCT OBJECTION

21 Responding party objects on the basis that the interrogatory, in whole or in part,
22 seeks disclosure of information that is protected under the attorney work-product doctrine.

23
24 I. MARITAL PRIVILEGE OBJECTION

25 Responding party objects on the basis that the request, in whole or in part, seeks
26 disclosure of information that is protected under marital privilege.

27 **REQUEST NO. 1**

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

3 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 1**

4 After a review of the Meet and Confer letter dated June 2, 2025 from Defendant's
5 Counsel, which in relevant part states that "Plaintiff recites a string of boilerplate objections
6 (e.g., vague, ambiguous, burdensome, harassing) without ever stating whether it will comply in
7 whole or in part [...]," Responding Party is unaware of any said objections. As part of this meet
8 and confer process, Responding Party requests that Propounding Party specify which objections
9 are being referred to pertaining to this request. Notwithstanding and without waiving the
10 foregoing objections, Responding Party responds as follows:

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

18 **REQUEST NO. 2**

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

21 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 2**

22 As part of this meet and confer process, Responding Party requests that Propounding
23 Party define the term "referencing" and "authored." Because this request is compound,
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