

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. 4**

5 STATE all actions YOU took to address DEFENDANT'S REPAIR REQUESTS in 2024.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 4**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous
8 regarding the term "all actions." Responding Party objects to this request on the grounds that it
9 seeks information protected from disclosure by the attorney-client privilege and attorney work
10 product doctrine and/or premature disclosure of expert witness information in violation of *Code of*
11 *Civil Procedure* §§ 2018 and 2034. Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

12 Responding Party exercises its right to produce writings under Code of Civil Procedure
13 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
14 further investigation, legal research and analysis will supply additional facts and provide new and
15 different meaning to known facts, and may establish new factual conclusions and legal contentions,
16 all of 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. 5**

20 STATE all actions YOU took to address DEFENDANT'S REPAIR REQUESTS in 2025.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 5**

22 Responding Party objects to this request on the grounds that it is vague and ambiguous
23 regarding the term "all actions." Responding Party objects to this request on the grounds that it

1 seeks information protected from disclosure by the attorney-client privilege and attorney work
2 product doctrine and/or premature disclosure of expert witness information in violation of *Code of*
3 *Civil Procedure* §§ 2018 and 2034. Subject to the foregoing objections, and without waiving them,
4 Responding Party responds as follows:

5 Responding Party exercises its right to produce writings under Code of Civil Procedure
6 Section 2030.210(a)(2). 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
to and including at trial.

11 **SPECIAL INTERROGATORY NO. 6**

12 State the date on which YOU first formed the intent to have Robert L. Fernandez move into
the PREMISES.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 6**

14 Responding Party objects to this request on the grounds that it is vague and ambiguous
15 regarding the term “date,” “intent.” Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

16 After a diligent search and a reasonable inquiry, Responding Party is unable to comply with
17 this request as the “intent” was not “formed” by Responding Party. Discovery is ongoing and it is
18 anticipated that additional discovery and further investigation, legal research and analysis will
19 supply additional facts and provide new and different meaning to known facts, and may establish
20 new factual conclusions and legal contentions, all of which may result in additional changes and/or
21 variations from the responses set herein and Responding Party reserves the right to supplement this
response at a later time as appropriate, up to and including at trial.

22 **SPECIAL INTERROGATORY NO. 7**

Describe in detail all facts that support YOUR contention that Robert L. Fernandez intended to move into the PREMISES at the time the NOTICE was served.

RESPONSE TO SPECIAL INTERROGATORY NO. 7

Responding Party objects to this request on the grounds that it is vague and ambiguous regarding the term “describe,” “all facts,” “contention.” Subject to the foregoing objections, and without waiving them, Responding Party responds as follows:

Robert L. Fernandez lived at Glen Park Assisted Living in Glendale, to care for his wife, Carol, during her battle with Alzheimer’s Disease until she passed away in hospice care in February 2023. Robert has expressed his desire to return to the PREMISES since her passing. Discovery is ongoing and it is anticipated that additional discovery and 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, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

SPECIAL INTERROGATORY NO. 8

IDENTIFY all DOCUMENTS that support YOUR contention that Robert L. Fernandez intended to move into the PREMISES at the time the NOTICE was served.

RESPONSE TO SPECIAL INTERROGATORY NO. 8

After a diligent search and a reasonable inquiry, Responding Party is unable to comply with this request because no such DOCUMENTS exist. Discovery is ongoing and it is anticipated that additional discovery and 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, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

SPECIAL INTERROGATORY NO. 9

State the current address of Robert L. Fernandez.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 9**

2 Responding Party objects to this request on the grounds that it is overbroad, vague, unduly
3 burdensome, and oppressive in scope and time. In addition, Responding Party also objects to this
4 request on the grounds that it seeks information that impairs a person's inalienable right of privacy
5 under the California Constitution and disclosure would violate Responding Party and the third
6 parties' right to privacy. Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

7 1 E Commonwealth Ave., Alhambra, CA 91801. Discovery is ongoing and it is anticipated
8 that additional discovery and further investigation, legal research and analysis will supply
9 additional facts and provide new and different meaning to known facts, and may establish new
10 factual conclusions and legal contentions, all of which may result in additional changes and/or
11 variations from the responses set herein and Responding Party reserves the right to supplement this
response at a later time as appropriate, up to and including at trial

12 **SPECIAL INTERROGATORY NO. 10**

13 State the name and address of any ASSISTED LIVING FACILITY in which Robert L.
14 Fernandez resided at any time between July 2024 and January 2025.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 10**

16 Responding Party objects to this request on the grounds that it is overbroad, vague, unduly
17 burdensome, and oppressive in scope and time. In addition, Responding Party also objects to this
18 request on the grounds that it seeks information that impairs a person's inalienable right of privacy
19 under the California Constitution and disclosure would violate Responding Party and the third
parties' right to privacy. Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

20 Savant Senior Living, 1 E Commonwealth Ave., Alhambra, CA 91801. Discovery is
21 ongoing and it is anticipated that additional discovery and further investigation, legal research and
22 analysis will supply additional facts and provide new and different meaning to known facts, and
23 may establish new factual conclusions and legal contentions, all of which may result in additional

1 changes and/or variations from the responses set herein and Responding Party reserves the right to
2 supplement this response at a later time as appropriate, up to and including at trial.

3 **SPECIAL INTERROGATORY NO. 11**

4 State the date on which YOU first became aware that DEFENDANT submitted REPAIR
5 REQUESTS CONCERNING water intrusion at the PREMISES.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 11**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous regarding
8 the term “aware,” “water intrusion.” This interrogatory is overbroad, vague, unduly burdensome,
9 and oppressive in scope and time. Subject to the foregoing objections, and without waiving them,
Responding Party responds as follows:

10 On or about September 2024. Discovery is ongoing and it is anticipated that additional
11 discovery and further investigation, legal research and analysis will supply additional facts and
12 provide new and different meaning to known facts, and may establish new factual conclusions and
13 legal contentions, all of which may result in additional changes and/or variations from the
14 responses set herein and Responding Party reserves the right to supplement this response at a later
time as appropriate, up to and including at trial.

15 **SPECIAL INTERROGATORY NO. 12**

16 IDENTIFY all PERSONS who received or responded to DEFENDANT'S REPAIR
17 REQUESTS made between September 2024 and January 2025.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 12**

19 Responding Party objects to this request on the grounds that it is vague and ambiguous
20 regarding the term “received,” “responded.” This interrogatory is compound, overbroad, vague,
unduly burdensome, and oppressive in scope and time. Responding Party also objects to this
21 request to the extent that it seeks information protected from disclosure by the attorney-client
22 privilege and attorney work product doctrine and/or premature disclosure of expert witness
Party also objects to this request on the grounds that it seeks information that impairs a person’s