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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**

BRADFORD M. MARTINEZ; VICKI L.)	CASE NO. 25PDUD00999
MARTINEZ; GAIL DIANE CALHOUN)	
AKA GAIL DIANE HOUSER,)	[Assigned for all purposes to the Hon.
)	Jerry B. Marshak, Dept. R]
Plaintiffs,)	
)	PLAINTIFF BRADFORD M.
v.)	MARTINEZ'S RESPONSE TO
)	SPECIAL INTERROGATORIES
JENNIFER BURBANK; JAMES)	
BURBANK, and DOES 1-10,)	Complaint Filed: April 1, 2025
)	
Defendants,)	Trial Date: June 3, 2025
)	
)	

PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

SET NO.: One

BRADFORD M. MARTINEZ ("Responding Party") hereby provides its response to
JENNIFER BURBANK'S ("Propounding Party") Special Interrogatories (Set One) as follows:

PRELIMINARY STATEMENT

These responses are made only for the purpose of the within action. Each response or
answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility

1 and any other objections and grounds that would require the exclusion of any statement herein if
2 any document was asked of, or if any statement contained therein were made by a witness present
3 and testifying in court, all of which objections and grounds are reserved and may be interposed at
4 the time of trial.

5 Plaintiff is responding to all Requests to the extent that information has become known
6 by him. However, this responding party's discovery, investigation and preparation for trial of this
7 matter has not been completed as of the date of these responses, and, therefore, Plaintiff does not
8 purport to state anything more than information presently known and discovered by him.

9 Plaintiff, in responding to these Requests, reserves the right to continue discovery and
10 investigation in this matter for facts, witnesses and supporting data that may recall information
11 which, if he had presently within his knowledge, would be included in these responses. For
12 example, to the extent that any request calls for the identification of 'all documents,' it is responded
13 to fully insofar as information is presently available to Plaintiff, and Plaintiff is not precluded from
14 presenting at trial information discovered after the date of the response of this request.

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

16 **GENERAL OBJECTIONS**

17 To avoid repetition in setting forth specific objections to interrogatories, responding party
18 sets forth and incorporates the following objections to responding party's each and every response.

19 **A. RELEVENCY OBJECTION**

20 Responding party objects on the basis that the interrogatory, in whole or in part, seek the
21 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
22 calculated to lead to the discovery of admissible evidence.

23 **B. CONFIDENTIALITY/PRIVACY OBJECTION**

1 Responding party objects on the basis that the interrogatory seeks the disclosure of confidential
2 information and constitute an attempt to invade the personal and/or financial privacy of certain
3 individuals or persons.

4 C. OVERBREADTH AND BURDEN OBJECTION

5 Responding party objects on the basis that the interrogatory is overbroad, burdensome and
6 oppressive in that they seek the disclosure of information that has little or no practical benefit to
7 propounding party while placing an unwarranted burden or expense on the responding party in
8 ascertaining such information. Further, such interrogatory is so broadly drawn that although it may
9 include some relevant information within its scope, it includes information that is irrelevant or
10 immaterial to the instant action. Such interrogatory seeks information which is cumulative and/or
11 would require the compilation of extensive and detailed information from numerous potential
12 sources, many of which is not easily identifiable or available. A search for all such information
13 will in many instances involve enormous amounts of time by responding party. Further, the
14 interrogatory is so overbroad such that it is uncertain what information is sought.

15 D. AMBIGUITY OBJECTION

16 Responding party objects on the basis that the interrogatory is phrased in language that is vague,
17 ambiguous, and uncertain such that responding party is unable to ascertain what information is
18 sought and in order to respond to this interrogatory, responding party would have to speculate as
19 to propounding party's intended meaning.

20 E. AVAILABILITY OBJECTION

21 Responding party objects on the basis that the interrogatory is equally accessible to all parties
22 or is more accessible to the propounding party or which is maintained primarily by persons or
entities other than responding party.

1 F. IMPROPER FORM OBJECTION

2 Responding party objects on the basis that the interrogatory is phrased in improper form
3 because the interrogatory is not “full and complete in and of itself”; or because it contains subpart,
4 “compound, conjunctive or disjunctive” question, such that the interrogatory does not comply with
5 the requirements of *California Code of Civil Procedure* §2030.060

6 G. LEGAL CONCLUSION OBJECTION

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

8 H. ATTORNEY WORK-PRODUCT OBJECTION

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

11 I. MARITAL PRIVILEGE OBJECTION

12 Responding party objects on the basis that the request, in whole or in part, seek
13 disclosure of information that is protected under marital privilege.

14 **SPECIAL INTERROGATORY NO. 1**

15 State the date on which the RENTAL AGREEMENT between YOU and the
16 DEFENDANT was executed.

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

18 Responding Party exercises its right to produce writings under Code of Civil Procedure
19 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
20 further investigation, legal research and analysis will supply additional facts and provide new and
21 different meaning to known facts, and may establish new factual conclusions and legal contentions,
22 all of which may result in additional changes and/or variations from the responses set herein and
23

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. 2**

4 IDENTIFY all DOCUMENTS that evidence the alleged service of the NOTICE on
5 DEFENDANT.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 2**

7 Responding Party exercises its right to produce writings under Code of Civil Procedure
8 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
9 further investigation, legal research and analysis will supply additional facts and provide new and
10 different meaning to known facts, and may establish new factual conclusions and legal contentions,
11 all of which may result in additional changes and/or variations from the responses set herein and
12 Responding Party reserves the right to supplement this response at a later time as appropriate, up
13 to and including at trial.

13 **SPECIAL INTERROGATORY NO. 3**

14 IDENTIFY all REPAIRS made at PREMISES during DEFENDANT's TENANCY at
15 PREMISES.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 3**

16 Responding Party objects to this request on the grounds that it is overbroad, vague, unduly
17 burdensome, and oppressive in scope and time. Responding Party objects to this request on the
18 grounds that it is vague and ambiguous regarding the term “compliance” as it calls for a legal
19 conclusion. Subject to the foregoing objections, and without waiving them, Responding Party
20 responds as follows:

21 Responding Party exercises its right to produce writings under Code of Civil Procedure
22 Section 2030.210(a)(2). 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,