

1 No. 16. As part of this meet and confer process, Responding Party requests that Propounding
2 Party specify where in Responding Party's prior response said language appears.

3 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
4 follows:
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6 Responding Party produces all relevant documents in Responding Party's possession or
7 control which are attached hereto or sent concurrently with these responses. Discovery is
8 ongoing and it is anticipated that additional discovery and further investigation, legal research
9 and analysis will supply additional facts and provide new and different meaning to known facts,
10 and may establish new factual conclusions and legal contentions, all of which may result in
11 additional changes and/or variations from the responses set herein and Responding Party reserves
12 the right to supplement this response at a later time as appropriate, up to and including at trial.
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14 **REQUEST NO. 17**

15 All DOCUMENTS CONCERNING any INSPECTIONS conducted at the PREMISES
16 from July 2024 to the present.
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18 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 17**

19 Responding Party produces all relevant documents in Responding Party's possession or
20 control which are attached hereto or sent concurrently with these responses. Discovery is
21 ongoing and it is anticipated that additional discovery and further investigation, legal research
22 and analysis will supply additional facts and provide new and different meaning to known facts,
23 and may establish new factual conclusions and legal contentions, all of which may result in
24 additional changes and/or variations from the responses set herein and Responding Party reserves
25 the right to supplement this response at a later time as appropriate, up to and including at trial.
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1 **REQUEST NO. 18**

2 All DOCUMENTS CONCERNING any legal advice or internal discussion about the
3 decision to terminate DEFENDANT'S TENANCY between January 1, 2025, and January 30,
4 2025.
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6 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 18**

7 As part of this meet and confer process, Responding Party requests that Propounding Party
8 define the term “legal advice,” “internal discussions.” Because this request is compound,
9 Responding Party requests that Propounding Party separate this request into distinct asks.
10 Additionally, this request seeks confidential, private and/or privileged documents of third parties
11 not part of the Action, the disclosure of which would violate their right to privacy. This request
12 seeks information protected by disclosure by the attorney-client privilege and/or work-product
13 doctrine and/or information prepared in anticipation of litigation, including physician-patient
14 privilege. Notwithstanding and without waiving the foregoing objections, Responding Party
15 responds as follows:
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18 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
19 with this request as propounded. Discovery is ongoing and it is anticipated that additional
20 discovery and further investigation, legal research and analysis will supply additional facts and
21 provide new and different meaning to known facts, and may establish new factual conclusions
22 and legal contentions, all of which may result in additional changes and/or variations from the
23 responses set herein and Responding Party reserves the right to supplement this response at a
24 later time as appropriate, up to and including at trial.
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1 **REQUEST NO. 20**

2 All DOCUMENTS pertaining to RENTAL AGREEMENTS between PLAINTIFF and
3 DEFENDANT.

4 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 20**

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

9 Responding Party produces all relevant documents in Responding Party’s possession or
10 control which are attached hereto or sent concurrently with these responses. Discovery is
11 ongoing and it is anticipated that additional discovery and further investigation, legal research
12 and analysis will supply additional facts and provide new and different meaning to known facts,
13 and may establish new factual conclusions and legal contentions, all of which may result in
14 additional changes and/or variations from the responses set herein and Responding Party reserves
15 the right to supplement this response at a later time as appropriate, up to and including at trial.
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18 **REQUEST NO. 21**

19 All DOCUMENTS that establish PLAINTIFF'S ownership interest in the PREMISES,
20 including but not limited to grant deeds, title reports, or recorded documents.

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

22
23 After a review of the Meet and Confer letter dated June 2, 2025 from Defendant’s
24 Counsel, which in relevant part states that “Plaintiff recites a string of boilerplate objections
25 (e.g., vague, ambiguous, burdensome, harassing) without ever stating whether it will comply in
26 whole or in part [...],” Responding Party is unaware of any said objections. As part of this meet
27 and confer process, Responding Party requests that Propounding Party specify which objections
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1 are being referred to pertaining to this request. Notwithstanding and without waiving the
2 foregoing objections, Responding Party responds as follows:

3 Responding Party produces all relevant documents in Responding Party's possession or
4 control which are attached hereto or sent concurrently with these responses. Discovery is
5 ongoing and it is anticipated that additional discovery and further investigation, legal research
6 and analysis will supply additional facts and provide new and different meaning to known facts,
7 and may establish new factual conclusions and legal contentions, all of which may result in
8 additional changes and/or variations from the responses set herein and Responding Party reserves
9 the right to supplement this response at a later time as appropriate, up to and including at trial.
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11 **REQUEST NO. 22**
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13 All DOCUMENTS that demonstrate PLAINTIFF had the legal right to recover possession
14 of the PREMISES at the time the NOTICE was served.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 22**
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17 After a review of the Meet and Confer letter dated June 2, 2025 from Defendant's
18 Counsel, which in relevant part states that "Plaintiff recites a string of boilerplate objections
19 (e.g., vague, ambiguous, burdensome, harassing) without ever stating whether it will comply in
20 whole or in part [...]," Responding Party is unaware of any said objections. As part of this meet
21 and confer process, Responding Party requests that Propounding Party specify which objections
22 are being referred to pertaining to this request. Notwithstanding and without waiving the
23 foregoing objections, Responding Party responds as follows:

24 Responding Party produces all relevant documents in Responding Party's possession or
25 control which are attached hereto or sent concurrently with these responses. Discovery is
26 ongoing and it is anticipated that additional discovery and further investigation, legal research
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1 and analysis will supply additional facts and provide new and different meaning to known facts,
2 and may establish new factual conclusions and legal contentions, all of which may result in
3 additional changes and/or variations from the responses set herein and Responding Party reserves
4 the right to supplement this response at a later time as appropriate, up to and including at trial.
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6 **REQUEST NO. 23**

7 All DOCUMENTS CONCERNING the legal formation and current status of any entity
8 that claims to own or manage the PREMISES.

9 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 23**

10 As part of this meet and confer process, Responding Party requests that Propounding
11 Party define the term “legal formation,” “current status,” “any entity,” “manage.” Because this
12 request is compound, Responding Party requests that Propounding Party separate this request
13 into distinct asks. Notwithstanding and without waiving the foregoing objections, Responding
14 Party responds as follows:
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16 Responding Party produces all relevant documents in Responding Party’s possession or
17 control which are attached hereto or sent concurrently with these responses. Discovery is
18 ongoing and it is anticipated that additional discovery and further investigation, legal research
19 and analysis will supply additional facts and provide new and different meaning to known facts,
20 and may establish new factual conclusions and legal contentions, all of which may result in
21 additional changes and/or variations from the responses set herein and Responding Party reserves
22 the right to supplement this response at a later time as appropriate, up to and including at trial.
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25 **REQUEST NO. 24**

26 All DOCUMENTS that reflect the name and legal identity of the PERSON or entity listed
27 as the owner of record for the PREMISES with the Los Angeles County Assessor's Office.
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