

1 additional discovery and further investigation, legal research and analysis will supply additional  
2 facts and provide new and different meaning to known facts, and may establish new factual  
3 conclusions and legal contentions, all of which may result in additional changes and/or variations  
4 from the responses set herein and Responding Party reserves the right to supplement this response  
5 at a later time as appropriate, up to and including at trial.  
6

7 **REQUEST FOR ADMISSION NO. 22**

8 Admit that Robert L. Fernandez is currently residing in a full-time assisted living facility.

9 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 22**

10 As part of this meet and confer process, Responding Party requests that Propounding Party  
11 define the term “assisted living facility.” Notwithstanding and without waiving the foregoing  
12 objections, Responding Party responds as follows: Deny.  
13

14 DATED: 6/6/2025

MARINACCIO LAW

15  
16 BY: Anthony Marinaccio  
17

18 Anthony Marinaccio, Esq.  
19 Attorney for Plaintiffs,  
20 Bradford M. Martinez, Vicki L. Martinez, and  
21 Gail Diane Calhoun AKA Gail Diane Houser  
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**VERIFICATION**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I HAVE read the following Supplemental Response to Request for Admission and know its contents.

I am a party to the action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on 06/06/2025 in Alhambra, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Type or Print Name: Bradford M. Martinez

Signature Bradford Martinez