

1 (b) The current monthly rental amount paid by Defendant, the LEASE;

2 (c) The current monthly rental amount due of \$3,250 divided by 30.

3 FORM INTERROGATORY 81.2

4 No

5 FORM INTERROGATORY 81.3

6 Not to Responding Party's current knowledge. Discovery is ongoing and it is anticipated  
7 that additional discovery and further investigation, legal research and analysis will supply  
8 additional facts and provide new and different meaning to known facts, and may establish new  
9 factual conclusions and legal contentions, all of which may result in additional changes and/or  
10 variations from the responses set herein and Responding Party reserves the right to supplement  
11 this response at a later time as appropriate, up to and including at trial.

12 DATED: May 30, 2025

MARINACCIO LAW

13 BY: /S/

14 Anthony Marinaccio, Esq.  
15 Attorney for Plaintiffs, Bradford M.  
16 Martinez, Vicki L. Martinez, and Gail Diane  
17 Calhoun AKA Gail Diane Houser

Exhibit “D”

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**VERIFICATION**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the following Response to Form Interrogatories 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 05/31/2025 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



**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 5150 E. Pacific Coast Hwy, Suite 200, Long Beach, CA 90804

On **July 1, 2025**, I served true copies of the following document(s) described as:  
**DEFENDANT'S NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT;  
MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF JENNIFER  
BURBANK AND JAMES BURBANK; DECLARATION OF DAGMAWI TESHALE**

**Date: July 8, 2025**

**Time: 1:30 PM**

**DEPT: Dept R.**

On the interested parties in this action as follows:

[SEE ATTACHED SERVICE LIST]

       **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and deposited the envelope in the ordinary course of business with the United States Postal Service, in a sealed envelope; with postage fully prepaid.

   X    **BY ELECTRONIC TRANSMISSION:** I transmitted a PDF version of this document by electronic mail to the party(s) identified on the attached service list using the e-mail address(es) indicated.

       **BY PERSONAL SERVICE:** I personally delivered a hard copy of this document to the individual listed at the attached service list.

       **BY OVERNIGHT DELIVERY:** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in the Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight

   X    **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

       **(Federal):** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 1, 2025, at Long Beach, California.

*Dagmawi Teshale*

Dagmawi Teshale

**SERVICE LIST**

Anthony Marinaccio

**Marinaccio Law**

225 W Broadway, Suite 103

Glendale, CA 91204

Phone: (818) 839-5220

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**ATTORNEY FOR THE PLAINTIFF**

Bradford M. Martinez, Vicki L. Martinez and Gail Diane Calhoun AKA Gail Diane Houser