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

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

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

Responding party objects on the basis that the interrogatory, in whole or in part, seek the

1 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
2 calculated to lead to the discovery of admissible evidence.

3 B. CONFIDENTIALITY/PRIVACY OBJECTION
4

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

8 C. OVERBREADTH AND BURDEN OBJECTION
9

10 Responding party objects on the basis that the interrogatory is overbroad, burdensome and
11 oppressive in that they seek the disclosure of information that has little or no practical benefit to
12 propounding party while placing an unwarranted burden or expense on the responding party in
13 ascertaining such information. Further, such interrogatory is so broadly drawn that although it
14 may include some relevant information within its scope, it includes information that is irrelevant
15 or immaterial to the instant action. Such interrogatory seeks information which is cumulative
16 and/or would require the compilation of extensive and detailed information from numerous
17 potential sources, many of which is not easily identifiable or available. A search for all such
18 information will in many instances involve enormous amounts of time by responding party.
19 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.
20
21

22 D. AMBIGUITY OBJECTION

23 Responding party objects on the basis that the interrogatory is phrased in language that is
24 vague, ambiguous, and uncertain such that responding party is unable to ascertain what
25 information is sought and in order to respond to this interrogatory, responding party would have
26 to speculate as to propounding party's intended meaning.
27

28 E. AVAILABILITY OBJECTION

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

4
5 F. IMPROPER FORM OBJECTION

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

10
11 G. LEGAL CONCLUSION OBJECTION

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

13 H. ATTORNEY WORK-PRODUCT OBJECTION

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

16
17 I. MARITAL PRIVILEGE OBJECTION

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

20
21 **SPECIAL INTERROGATORY NO. 1**

22 State the date on which the RENTAL AGREEMENT between YOU and the
23 DEFENDANT was executed.

24 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 1**

25 Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2). See, Residential Lease or Month-to-Month Rental Agreement (“Lease”)
27 attached hereto or produced concurrently herewith. Said Lease was also attached as exhibit 1 to
28

1 Plaintiff's Complaint in the present unlawful detainer matter. Discovery is ongoing and it is
2 anticipated that additional discovery and further investigation, legal research and analysis will
3 supply additional facts and provide new and different meaning to known facts, and may establish
4 new factual conclusions and legal contentions, all of which may result in additional changes and/or
5 variations from the responses set herein and Responding Party reserves the right to supplement
6 this response at a later time as appropriate, up to and including at trial.
7

8 **SPECIAL INTERROGATORY NO. 2**

9 IDENTIFY all DOCUMENTS that evidence the alleged service of the NOTICE on
10 DEFENDANT.
11

12 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 2**

13 Responding Party exercises its right to produce writings under Code of Civil Procedure
14 Section 2030.210(a)(2). See, Proof of Service of Notice ("POS") attached hereto or produced
15 concurrently herewith. Said POS was also attached as exhibit 3 to Plaintiff's Complaint in the
16 present unlawful detainer matter. Discovery is ongoing and it is anticipated that additional
17 discovery and further investigation, legal research and analysis will supply additional facts and
18 provide new and different meaning to known facts, and may establish new factual conclusions and
19 legal contentions, all of which may result in additional changes and/or variations from the
20 responses set herein and Responding Party reserves the right to supplement this response at a later
21 time as appropriate, up to and including at trial.
22

23 **SPECIAL INTERROGATORY NO. 3**

24 IDENTIFY all REPAIRS made at PREMISES during DEFENDANT's TENANCY at
25 PREMISES.
26

27 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 3**

28 Responding Party exercises its right to produce writings under Code of Civil Procedure
Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced

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

7 **SPECIAL INTERROGATORY NO. 4**

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

9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 4**

10
11 Responding Party exercises its right to produce writings under Code of Civil Procedure
12 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
13 concurrently herewith. 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
20 **SPECIAL INTERROGATORY NO. 5**

21
22 STATE all actions YOU took to address DEFENDANT'S REPAIR REQUESTS in 2025.

23 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 5**

24
25 Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
27 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
28 further investigation, legal research and analysis will supply additional facts and provide new and

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

5 **SPECIAL INTERROGATORY NO. 6**

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

8 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 6**

9 As part of this meet and confer, Responding Party requests that Propounding Party define
10 the term “date,” “intent.” Subject to the foregoing objections, and without waiving them,
11 Responding Party responds as follows: The “intent” was not “formed” by Responding Party.
12 Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal
13 research and analysis will supply additional facts and provide new and different meaning to known
14 facts, and may establish new factual conclusions and legal contentions, all of which may result in
15 additional changes and/or variations from the responses set herein and Responding Party reserves
16 the right to supplement this response at a later time as appropriate, up to and including at trial.

17 **SPECIAL INTERROGATORY NO. 7**

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

20 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 7**

21 As part of this meet and confer, Responding Party requests that Propounding Party define
22 the term “describe,” “all facts,” “contention.” Subject to the foregoing objections, and without
23 waiving them, Responding Party responds as follows:

24 Robert L. Fernandez lived at Glen Park Assisted Living in Glendale, to care for his wife,
25 Carol, during her battle with Alzheimer’s Disease until she passed away in hospice care in
26 February 2023. Robert has expressed his desire to return to the PREMISES since her passing.

27 Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal

1 research and analysis will supply additional facts and provide new and different meaning to known
2 facts, 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.

5 **SPECIAL INTERROGATORY NO. 8**

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

8 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 8**

9 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
10 with this request because no such DOCUMENTS exist. Discovery is ongoing and it is anticipated
11 that additional discovery and further investigation, legal research and analysis will supply
12 additional facts and provide new and different meaning to known facts, and may establish new
13 factual conclusions and legal contentions, all of which may result in additional changes and/or
14 variations from the responses set herein and Responding Party reserves the right to supplement
15 this response at a later time as appropriate, up to and including at trial.

16 **SPECIAL INTERROGATORY NO. 9**

17 State the current address of Robert L. Fernandez.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 9**

19 1 E Commonwealth Ave., Alhambra, CA 91801. Discovery is ongoing and it is anticipated
20 that additional discovery and further investigation, legal research and analysis will supply
21 additional facts and provide new and different meaning to known facts, and may establish new
22 factual conclusions and legal contentions, all of which may result in additional changes and/or
23 variations from the responses set herein and Responding Party reserves the right to supplement
24 this response at a later time as appropriate, up to and including at trial

25 **SPECIAL INTERROGATORY NO. 10**

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

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 10**

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

9 **SPECIAL INTERROGATORY NO. 11**

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

12 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 11**

13 As part of this meet and confer, Responding Party requests that Propounding Party define
14 the term “aware,” “water intrusion.” Subject to the foregoing objections, and without waiving
15 them, Responding Party responds as follows: On or about September 2024. Discovery is ongoing
16 and it is anticipated that additional discovery and further investigation, legal research and analysis
17 will supply additional facts and provide new and different meaning to known facts, and may
18 establish new factual conclusions and legal contentions, all of which may result in additional
19 changes and/or variations from the responses set herein and Responding Party reserves the right
20 to supplement this response at a later time as appropriate, up to and including at trial.
21

22 **SPECIAL INTERROGATORY NO. 12**

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

25 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 12**

26 As part of this meet and confer, Responding Party requests that Propounding Party define
27 the term “received,” “responded.” Subject to the foregoing objections, and without waiving them,
28 Responding Party responds as follows:

1 Responding Party exercises its right to produce writings under Code of Civil Procedure
2 Section 2030.210(a)(2). Responding Party, Vicki Martinez, Gail Houser, Richard Dean Houser,
3 all of whom can be contacted via Responding Party's Counsel of record. Discovery is ongoing and
4 it is anticipated that additional discovery and further investigation, legal research and analysis will
5 supply additional facts and provide new and different meaning to known facts, and may establish
6 new factual conclusions and legal contentions, all of which may result in additional changes and/or
7 variations from the responses set herein and Responding Party reserves the right to supplement
8 this response at a later time as appropriate, up to and including at trial.

9
10 **SPECIAL INTERROGATORY NO. 13**

11 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
12 had submitted a COMPLAINT to the California Civil Rights Department CONCERNING the
13 PREMISES.

14 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 13**

15 As part of this meet and confer, Responding Party requests that Propounding Party define
16 the term "aware," "served," "submitted." Subject to the foregoing objections, and without waiving
17 them, Responding Party responds as follows:

18 Responding Party lacks knowledge of actions taken by Propounding Party at the time the
19 NOTICE was served. 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 Responding Party reserves the right to supplement this response at a later time as appropriate, up
24 to and including at trial.

25
26 **SPECIAL INTERROGATORY NO. 14**

27 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
28 had submitted a COMPLAINT to the Los Angeles County Department of Public Health
CONCERNING the PREMISES.

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 14**

2 As part of this meet and confer, Responding Party requests that Propounding Party define
3 the term “aware,” “served,” “submitted.” Subject to the foregoing objections, and without waiving
4 them, Responding Party responds as follows:

5 Responding Party lacks knowledge of actions taken by Propounding Party at the time the
6 NOTICE was served. 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
8 and different meaning to known facts, and may establish new factual conclusions and legal
9 contentions, all of which may result in additional changes and/or variations from the responses
10 set herein and Responding Party reserves the right to supplement this response at a later time as
11 appropriate, up to and including at trial.
12

13 **SPECIAL INTERROGATORY NO. 15**

14 State all reasons why YOU served the NOTICE on or about January 30, 2025.

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

16 Responding Party exercises its right to produce writings under Code of Civil Procedure
17 Section 2030.210(a)(2). See, 60 Day Notice to Quit (“60DN”) attached hereto or produced
18 concurrently herewith. Said 60DN was also attached as exhibit 2 to Plaintiff’s Complaint in the
19 present unlawful detainer matter. Robert L. Fernandez will occupy the underlying premises.
20 Discovery is ongoing and it is anticipated that additional discovery and further investigation, legal
21 research and analysis will supply additional facts and provide new and different meaning to known
22 facts, and may establish new factual conclusions and legal contentions, all of which may result in
23 additional changes and/or variations from the responses set herein and Responding Party reserves
24 the right to supplement this response at a later time as appropriate, up to and including at trial.
25

26 **SPECIAL INTERROGATORY NO. 16**

27 State all the reasons you gave DEFENDANT's for wanting them to vacate premises prior
28 to serving them with the NOTICE.

///

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 16**

2 As part of this meet and confer process, Responding Party requests that Propounding Party
3 rephrase this request. As phrased, request is incomprehensible leaving Responding Party unable
4 to determine what is being requested. Discovery is ongoing and it is anticipated that additional
5 discovery and further investigation, legal research and analysis will supply additional facts and
6 provide new and different meaning to known facts, and may establish new factual conclusions and
7 legal contentions, all of which may result in additional changes and/or variations from the
8 responses set herein and Responding Party reserves the right to supplement this response at a later
9 time as appropriate, up to and including at trial.

10
11 **SPECIAL INTERROGATORY NO. 17**

12 Describe in detail how YOU and any PERSON acting on YOUR behalf responded to
13 DEFENDANT'S REPAIR REQUESTS made between September 2024 and January 2025.

14 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 17**

15 As part of this meet and confer, Responding Party requests that Propounding Party define
16 the term “describe in detail.” Because this request is compound, Responding Party also requests
17 that Propounding Party separate this request into separate questions. Subject to the foregoing
18 objections, and without waiving them, Responding Party responds as follows:

19 Responding Party exercises its right to produce writings under Code of Civil Procedure
20 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
21 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
22 further investigation, legal research and analysis will supply additional facts and provide new and
23 different meaning to known facts, and may establish new factual conclusions and legal contentions,
24 all of which may result in additional changes and/or variations from the responses set herein and
25 Responding Party reserves the right to supplement this response at a later time as appropriate, up
26 to and including at trial.

27 ///

28 ///

1 **SPECIAL INTERROGATORY NO. 18**

2 IDENTIFY all DOCUMENTS referencing or CONCERNING communications between
3 PLAINTIFF and DEFENDANT between January 1, 2025, and January 30, 2025.

4 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 18**

5 As part of this meet and confer process, Responding Party requests that Propounding Party
6 separate this compound request into separate questions. Subject to the foregoing and previous
7 objections, and without waiving them, Responding Party responds as follows:

8 Responding Party exercises its right to produce writings under Code of Civil Procedure
9 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
10 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
11 further investigation, legal research and analysis will supply additional facts and provide new and
12 different meaning to known facts, and may establish new factual conclusions and legal contentions,
13 all of which may result in additional changes and/or variations from the responses set herein and
14 Responding Party reserves the right to supplement this response at a later time as appropriate, up
15 to and including at trial.

16 **SPECIAL INTERROGATORY NO. 19**

17 State whether YOU believe DEFENDANT'S REPAIR REQUESTS and COMPLAINTS
18 to government agencies were PROTECTED ACTIVITY under California law.

19 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 19**

20 As part of this meet and confer, Responding Party requests that Propounding Party define
21 the term "government agencies," "California law." Because this request is compound, Responding
22 Party also requests that Propounding Party separate this request into separate questions. Subject to
23 the foregoing objections, and without waiving them, Responding Party responds as follows:

24 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
25 with this request as propounded. Discovery is ongoing and it is anticipated that additional
26 discovery and further investigation, legal research and analysis will supply additional facts and
27 provide new and different meaning to known facts, and may establish new factual conclusions and
28

1 legal contentions, all of which may result in additional changes and/or variations from the
2 responses set herein and Responding Party reserves the right to supplement this response at a later
3 time as appropriate, up to and including at trial.

4 **SPECIAL INTERROGATORY NO. 20**

5 State whether YOU were aware, at the time the NOTICE was served, that DEFENDANT
6 had complained about water intrusion at the PREMISES.

7 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 20**

8 As part of this meet and confer, Responding Party requests that Propounding Party define
9 the term “aware,” “water intrusion,” “complained.” Subject to the foregoing objections, and
10 without waiving them, Responding Party responds as follows:

11 See response to Special Interrogatory No. 11. Discovery is ongoing and it is anticipated
12 that additional discovery and further investigation, legal research and analysis will supply
13 additional facts and provide new and different meaning to known facts, and may establish new
14 factual conclusions and legal contentions, all of which may result in additional changes and/or
15 variations from the responses set herein and Responding Party reserves the right to supplement
16 this response at a later time as appropriate, up to and including at trial.

17 **SPECIAL INTERROGATORY NO. 21**

18 IDENTIFY the date YOU first received a REPAIR REQUEST from DEFENDANT
19 CONCERNING water intrusion at the PREMISES.

20 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 21**

21 As part of this meet and confer, Responding Party requests that Propounding Party define
22 the term “received,” “water intrusion.” Subject to the foregoing objections, and without waiving
23 them, Responding Party responds as follows:

24 See responses to Special Interrogatory Nos. 11, 20. Discovery is ongoing and it is
25 anticipated that additional discovery and further investigation, legal research and analysis will
26 supply additional facts and provide new and different meaning to known facts, and may establish
27 new factual conclusions and legal contentions, all of which may result in additional changes and/or
28

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

3 **SPECIAL INTERROGATORY NO. 22**

4 IDENTIFY all REPAIR REQUESTS received from DEFENDANT between September 1,
5 2024, and January 30, 2025.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 22**

7 Responding Party exercises its right to produce writings under Code of Civil Procedure
8 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
9 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
10 further investigation, legal research and analysis will supply additional facts and provide new and
11 different meaning to known facts, and may establish new factual conclusions and legal contentions,
12 all of which may result in additional changes and/or variations from the responses set herein and
13 Responding Party reserves the right to supplement this response at a later time as appropriate, up
14 to and including at trial.

15 **SPECIAL INTERROGATORY NO. 23**

16 Describe all actions YOU took in response to DEFENDANT'S REPAIR REQUESTS
17 referenced in Interrogatory No. 22.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 23**

19 As part of this meet and confer, Responding Party requests that Propounding Party define
20 the term "describe," "all actions." Subject to the foregoing objections, and without waiving them,
21 Responding Party responds as follows:

22 Responding Party exercises its right to produce writings under Code of Civil Procedure
23 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
24 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
25 further investigation, legal research and analysis will supply additional facts and provide new and
26 different meaning to known facts, and may establish new factual conclusions and legal contentions,
27 all of which may result in additional changes and/or variations from the responses set herein and
28

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. 24**

4 State whether YOU received any written communication from DEFENDANT between
5 January 25, 2025, and January 30, 2025.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 24**

7 As part of this meet and confer, Responding Party requests that Propounding Party define
8 the term “state,” “received,” “written communication.” Subject to the foregoing objections, and
9 without waiving them, Responding Party responds as follows:
10

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

17 **SPECIAL INTERROGATORY NO. 25**

18 If YOU received any written communication from DEFENDANT between January 25,
19 2025, and January 30, 2025, IDENTIFY the DOCUMENT and state the date it was received.

20 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 25**

21 As part of this meet and confer, Responding Party requests that Propounding Party define
22 the term “state,” “received,” “written communication.” Subject to the foregoing objections, and
23 without waiving them, Responding Party responds as follows:
24

25 Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
27 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
28 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.

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. 26**

5 State whether the NOTICE was prepared or served in response to any communication
6 from DEFENDANT regarding REPAIRS, water intrusion, or habitability.

7 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 26**

8 As part of this meet and confer, Responding Party requests that Propounding Party define
9 the term “state,” “water intrusion,” “any communication,” “habitability.” Because this request is
10 compound, Responding Party requests that Propounding Party break this request into separate
11 questions. Subject to the foregoing objections, and without waiving them, Responding Party
12 responds as follows:

13 No. Discovery is ongoing and it is anticipated that additional discovery and further
14 investigation, legal research and analysis will supply additional facts and provide new and different
15 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
16 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. 27**

20 State whether YOU believe that DEFENDANT'S habitability-related COMPLAINTS
21 were a motivating factor in YOUR decision to serve the NOTICE.

22 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 27**

23 As part of this meet and confer, Responding Party requests that Propounding Party define
24 the term “state,” “habitability-related.” Subject to the foregoing objections, and without waiving
25 them, Responding Party responds as follows:

26 No. Discovery is ongoing and it is anticipated that additional discovery and further
27 investigation, legal research and analysis will supply additional facts and provide new and different
28

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

5 **SPECIAL INTERROGATORY NO. 28**

6 IDENTIFY all PERSONS involved in the preparation, drafting, or service of the
7 NOTICE.
8

9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 28**

10 As part of this meet and confer, Responding Party requests that Propounding Party define
11 the term “preparation,” “drafting.” Because this request is compound, Responding Party requests
12 that Propounding Party separate this request into separate questions. Subject to the foregoing
13 objections, and without waiving them, Responding Party responds as follows:

14 Responding Party exercises its right to produce writings under Code of Civil Procedure
15 Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced
16 concurrently herewith. Discovery is ongoing and it is anticipated that additional discovery and
17 further investigation, legal research and analysis will supply additional facts and provide new and
18 different meaning to known facts, and may establish new factual conclusions and legal contentions,
19 all of which may result in additional changes and/or variations from the responses set herein and
20 Responding Party reserves the right to supplement this response at a later time as appropriate, up
21 to and including at trial.

22 **SPECIAL INTERROGATORY NO. 29**

23 State whether YOU or any PERSON acting on YOUR behalf made any statements
24 expressing frustration, concern, or annoyance about DEFENDANT'S REPAIR REQUESTS or
25 COMPLAINTS before the NOTICE was served.
26

27 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 29**

28 As part of this meet and confer, Responding Party requests that Propounding Party define
the term “state,” “any statements,” “frustration,” “concern,” “annoyance.” Because this request is

1 compound, Responding Party also requests that Propounding Party separate this request into
2 separate questions. Subject to the foregoing objections, and without waiving them, Responding
3 Party responds as follows:

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

10 **SPECIAL INTERROGATORY NO. 30**

11 IDENTIFY all DOCUMENTS CONCERNING any complaints, comments, or statements
12 made by PLAINTIFF, PROPERTY MANAGER, or their agents CONCERNING
13 DEFENDANT'S REPAIR REQUESTS or COMPLAINTS made between September 2024 and
14 January 2025.

15 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 30**

16 As part of this meet and confer, Responding Party requests that Propounding Party define
17 the term "complaints," "comments," "statements," "agents." Because this request is compound,
18 Responding Party also requests that Propounding Party separate this request into separate
19 questions. Subject to the foregoing objections, and without waiving them, Responding Party
20 responds as follows:

21 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
22 with this request as propounded. Discovery is ongoing and it is anticipated that additional
23 discovery and further investigation, legal research and analysis will supply additional facts and
24 provide new and different meaning to known facts, and may establish new factual conclusions and
25 legal contentions, all of which may result in additional changes and/or variations from the
26 responses set herein and Responding Party reserves the right to supplement this response at a later
27 time as appropriate, up to and including at trial.

1 DATED: 6/6/2025

MARINACCIO LAW

2
3 BY: Anthony Marinaccio

4 Anthony Marinaccio, Esq.
5 Attorney for Plaintiff Bradford M. Martinez, Vicki
6 L. Martinez, and Gail Diane Calhoun AKA Gail
7 Diane Houser
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1 **VERIFICATION**

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3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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5 I have read the following Supplemental Response to Special Interrogatories and know its

6 contents.

7 I am a party to the action. The matters stated in the foregoing document are true of my

8 own knowledge except as to those matters which are stated on information and belief, and as to

9 those matters I believe them to be true.

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

11 I declare under penalty of perjury under the laws of the State of California that the foregoing is

12 true and correct.

13 Type or Print Name: Bradford M. Martinez

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15 Signature Bradford Martinez

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