

1 BRADFORD M. MARTINEZ ("Responding Party") hereby provides its supplemental
2 responses to JENNIFER BURBANK'S ("Propounding Party") Request for Production of
3 Documents (Set One) as follows:

4 **PRELIMINARY STATEMENT**

5
6 These responses are made only for the purpose of the within action. Each response or
7 answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility
8 and any other objections and grounds that would require the exclusion of any statement herein if
9 any document was asked of, or if any statement contained therein were made by a witness present
10 and testifying in court, all of which objections and grounds are reserved and may be interposed at
11 the time of trial.

12
13 Defendant is responding to all Requests to the extent that information has become known
14 by him. However, this Responding Party's discovery, investigation and preparation for trial of
15 this matter has not been completed as of the date of these responses, and, therefore, Defendant
16 does not purport to state anything more than information presently known and discovered by him.

17
18 Defendant, in responding to these Requests, reserves the right to continue discovery and
19 investigation in this matter for facts, witnesses and supporting data that may recall information
20 which, if he had presently within his knowledge, would be included in these responses. For
21 example, to the extent that any request calls for the identification of "all documents," it is
22 responded to fully insofar as information is presently available to Defendant, and Defendant is not
23 precluded from presenting at trial information discovered after the date of the response of this
24 request.

25
26 This preliminary statement is incorporated into each of the responses set forth below.

27 **GENERAL OBJECTIONS**

1 To avoid repetition in setting forth specific objections to interrogatories, Responding Party
2 sets forth and incorporates the following objections to Responding Party's each and every
3 response.

4
5 A. RELEVANCE OBJECTION

6 Responding party objects on the basis that the interrogatory, in whole or in part, seeks the
7 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
8 calculated to lead to the discovery of admissible evidence.

9
10 B. CONFIDENTIALITY/PRIVACY OBJECTION

11 Responding party objects on the basis that the interrogatory seeks the disclosure of confidential
12 information and constitutes an attempt to invade the personal and/or financial privacy of certain
13 individuals or persons.

14
15 C. OVERBREADTH AND BURDEN OBJECTION

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

1 Responding party objects on the basis that the interrogatory is phrased in language that is
2 vague, ambiguous, and uncertain such that Responding Party is unable to ascertain what
3 information is sought and in order to respond to this interrogatory, Responding Party would have
4 to speculate as to Propounding Party's intended meaning.

5
6 E. AVAILABILITY OBJECTION

7 Responding party objects on the basis that the interrogatory is equally accessible to all parties
8 or is more accessible to the Propounding Party or which is maintained primarily by persons or
9 entities other than Responding Party.

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11 F. IMPROPER FORM OBJECTION

12 Responding party objects on the basis that the interrogatory is phrased in improper form
13 because the interrogatory is not "full and complete in and of itself"; or because it contains subpart,
14 "compound, conjunctive or disjunctive" question, such that the interrogatory does not comply with
15 the requirements of *California Code of Civil Procedure* §2030.060

16
17 G. LEGAL CONCLUSION OBJECTION

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

19
20 H. ATTORNEY WORK-PRODUCT OBJECTION

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

23
24 I. MARITAL PRIVILEGE OBJECTION

25 Responding party objects on the basis that the request, in whole or in part, seeks
26 disclosure of information that is protected under marital privilege.

27 **REQUEST NO. 1**

1 All DOCUMENTS that support YOUR contention that Robert L. Fernandez intends or
2 intended to move into the PREMISES.

3 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 1**

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

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

18 **REQUEST NO. 2**

19 All DOCUMENTS referencing, signed by, or authored by Robert L. Fernandez
20 CONCERNING his alleged intent to move into the PREMISES.

21 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 2**

22 As part of this meet and confer process, Responding Party requests that Propounding
23 Party define the term "referencing" and "authored." Because this request is compound,
24

1 Responding Party requests that Propounding Party separate this request into distinct asks.

2 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
3 follows:

4 Responding Party produces all relevant documents in Responding Party's possession or
5 control which are attached hereto or sent concurrently with these responses. Discovery is
6 ongoing and it is anticipated that additional discovery and further investigation, legal research
7 and analysis will supply additional facts and provide new and different meaning to known facts,
8 and may establish new factual conclusions and legal contentions, all of which may result in
9 additional changes and/or variations from the responses set herein and Responding Party reserves
10 the right to supplement this response at a later time as appropriate, up to and including at trial.

11 **REQUEST NO. 3**

12 All DOCUMENTS relating to the physical condition or medical needs of Robert L.
13 Fernandez between July 2024 and the present, including any DOCUMENTS reflecting his
14 residency in any ASSISTED LIVING FACILITY.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 3**

16 As part of this meet and confer process, Responding Party requests that Propounding
17 Party define the term "relating," "physical condition," "medical needs," "reflecting" "residency."
18 Because this request is compound, Responding Party requests that Propounding Party separate
19 this request into distinct asks. Additionally, this request seeks confidential, private and/or
20 privileged documents of third parties not part of the present unlawful detainer matter bearing
21 case number 25PDUD00999 ("Action"), the disclosure of which would violate their right to
22 privacy. This request seeks information protected by disclosure by the attorney-client privilege
23 and/or work-product doctrine and/or information prepared in anticipation of litigation, including
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1 physician-patient privilege. Notwithstanding and without waiving the foregoing objections,
2 Responding Party responds as follows:

3 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
4 with this request as propounded. 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
7 and 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
9 later time as appropriate, up to and including at trial.
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12 **REQUEST NO. 4**

13 All DOCUMENTS YOU relied upon in preparing, drafting, or serving the NOTICE.

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

15 As part of this meet and confer process, because this request is compound, Responding
16 Party requests that Propounding Party separate this request into distinct asks. Additionally, this
17 request seeks confidential, private and/or privileged documents of third parties not part of the
18 Action, the disclosure of which would violate their right to privacy. This request seeks
19 information protected by disclosure by the attorney-client privilege and/or work-product doctrine
20 and/or information prepared in anticipation of litigation, including physician-patient privilege.
21 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
22 follows:
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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
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1 provide new and different meaning to known facts, and may establish new factual conclusions
2 and legal contentions, all of which may result in additional changes and/or variations from the
3 responses set herein and Responding Party reserves the right to supplement this response at a
4 later time as appropriate, up to and including at trial.
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6 **REQUEST NO. 5**

7 All DOCUMENTS CONCERNING REPAIR REQUESTS made by DEFENDANT
8 between September 2024 and January 2025.

9 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 5**

10 Responding Party produces all relevant documents in Responding Party's possession or
11 control which are attached hereto or sent concurrently with these responses. Discovery is
12 ongoing and it is anticipated that additional discovery and further investigation, legal research
13 and analysis will supply additional facts and provide new and different meaning to known facts,
14 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.
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18 **REQUEST NO. 6**

19 All DOCUMENTS CONCERNING any response by PLAINTIFF or PROPERTY
20 MANAGER to the REPAIR REQUESTS referenced in Request No. 5.
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22 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 6**

23 As part of this meet and confer process, Responding Party requests that Propounding Party
24 define the term "any response." Because this request is compound, Responding Party requests that
25 Propounding Party separate this request into distinct asks. Additionally, this request seeks
26 confidential, private and/or privileged documents of third parties not part of the Action, the
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1 disclosure of which would violate their right to privacy. This request seeks information protected
2 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
3 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and
4 without waiving the foregoing objections, Responding Party responds as 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. 7**

15 All DOCUMENTS CONCERNING water intrusion, moisture, mold, or plumbing issues
16 at the PREMISES from September 2024 to the present.

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18 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 7**

19 As part of this meet and confer process, Responding Party requests that Propounding Party
20 define the term "water intrusion," "moisture," "plumbing issues," "mold." Because this request is
21 compound, Responding Party requests that Propounding Party separate this request into distinct
22 asks. Additionally, this request seeks confidential, private and/or privileged documents of third
23 parties not part of the Action, the disclosure of which would violate their right to privacy. This
24 request seeks information protected by disclosure by the attorney-client privilege and/or work-
25 product doctrine and/or information prepared in anticipation of litigation, including physician-
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1 patient privilege. Notwithstanding and without waiving the foregoing objections, Responding
2 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 ongoing
5 and it is anticipated that additional discovery and further investigation, legal research and analysis
6 will supply additional facts and provide new and different meaning to known facts, and may
7 establish new factual conclusions and legal contentions, all of which may result in additional
8 changes and/or variations from the responses set herein and Responding Party reserves the right
9 to supplement this response at a later time as appropriate, up to and including at trial.
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12 **REQUEST NO. 8**

13 All COMMUNICATIONS between PLAINTIFF and DEFENDANT between September
14 1, 2024, and January 30, 2025.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 8**

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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1 **REQUEST NO. 9**

2 All DOCUMENTS reflecting any COMPLAINT, criticism, or statement made by
3 PLAINTIFF or PROPERTY MANAGER CONCERNING DEFENDANT'S habitability
4 COMPLAINTS or REPAIR REQUESTS.
5

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

7 As part of this meet and confer process, Responding Party requests that Propounding Party
8 define the term "criticism," "statement," "habitability." 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 because no such document exists or is no longer in possession of Responding
20 Party. Discovery is ongoing and it is anticipated that additional discovery and further
21 investigation, legal research and analysis will supply additional facts and provide new and
22 different meaning to known facts, and may establish new factual conclusions and legal
23 contentions, all of which may result in additional changes and/or variations from the responses
24 set herein and Responding Party reserves the right to supplement this response at a later time as
25 appropriate, up to and including at trial.
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1 **REQUEST NO. 11**

2 All DOCUMENTS CONCERNING June 19, 2024 non-renewal notice served on
3 DEFENDANT.

4 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 11**

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6 As part of this meet and confer process, Responding Party requests that Propounding
7 Party define the term “non-renewal notice,” “served.” Additionally, this request seeks
8 confidential, private and/or privileged documents of third parties not part of the Action, the
9 disclosure of which would violate their right to privacy. This request seeks information protected
10 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
11 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and
12 without waiving the foregoing objections, Responding Party responds as follows:

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

24 All DOCUMENTS reflecting any determination by PLAINTIFF that the PREMISES was
25 needed for owner or relative occupancy prior to January 30, 2025.

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1 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 12**

2 As part of this meet and confer process, Responding Party requests that Propounding
3 Party define the term “reflecting,” “any determination,” “owner,” “relative.” Because this request
4 is compound, Responding Party requests that Propounding Party separate this request into
5 distinct asks. Notwithstanding and without waiving the foregoing objections, Responding Party
6 responds as follows:
7

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

16 **REQUEST NO. 13**

17 All DOCUMENTS CONCERNING PLAINTIFF'S compliance or claimed exemption
18 from the Tenant Protection Act (Civil Code§ 1946.2) in relation to this TENANCY.
19

20 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 13**

21 As part of this meet and confer process, Responding Party requests that Propounding Party
22 define the term “compliance,” “claimed exemption.” Because this request is compound,
23 Responding Party requests that Propounding Party separate this request into distinct asks.
24 Responding Party requests that Propounding Party specify which sections and corresponding
25 subparts of the various Civil Code Sections cited by Propounding Party (Civil Code sections
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1 1946.2) this request concerns. Notwithstanding and without waiving the foregoing objections,
2 Responding Party responds as follows:

3 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
4 with this request as propounded. 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
7 and 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
9 later time as appropriate, up to and including at trial.
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12 **REQUEST NO. 14**

13 All DOCUMENTS CONCERNING any COMMUNICATIONS between PLAINTIFF and
14 any government agency regarding DEFENDANT or the PREMISES.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 14**

16
17 As part of this meet and confer process, Responding Party requests that Propounding Party
18 define the term “government agency.” Because this request is compound, Responding Party
19 requests that Propounding Party separate this request into distinct asks. Notwithstanding and
20 without waiving the foregoing objections, Responding Party responds as follows:

21 Responding Party produces all relevant documents in Responding Party’s possession or
22 control which are attached hereto or sent concurrently with these responses. Discovery is
23 ongoing and it is anticipated that additional discovery and further investigation, legal research
24 and analysis will supply additional facts and provide new and different meaning to known facts,
25 and may establish new factual conclusions and legal contentions, all of which may result in
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1 additional changes and/or variations from the responses set herein and Responding Party reserves
2 the right to supplement this response at a later time as appropriate, up to and including at trial.

3 **REQUEST NO. 15**

4 All DOCUMENTS submitted to or received from the any government entity
5 CONCERNING DEFENDANT'S TENANCY.

6 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 15**

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8 As part of this meet and confer process, Responding Party requests that Propounding Party
9 define the term “government entity.” Responding Party requests that Propounding Party specify
10 whom the party “submitt[ing]” the DOCUMENTS this request concerns. Notwithstanding and
11 without waiving the foregoing objections, Responding Party responds as follows:

12
13 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
14 with this request as propounded. Discovery is ongoing and it is anticipated that additional
15 discovery and further investigation, legal research and analysis will supply additional facts and
16 provide new and different meaning to known facts, and may establish new factual conclusions
17 and legal contentions, all of which may result in additional changes and/or variations from the
18 responses set herein and Responding Party reserves the right to supplement this response at a
19 later time as appropriate, up to and including at trial.
20

21 **REQUEST NO. 16**

22 All DOCUMENTS that PLAINTIFF intends to rely on at trial in this CASE.

23 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 16**

24
25 After a review of the Meet and Confer letter dated June 2, 2025 from Defendant’s
26 Counsel, which in relevant part states that “Plaintiff vaguely promises to produce ‘non-privileged
27 documents, if any,” Responding Party is unaware of any said response to Request for Production
28

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:
5

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.
13

14 **REQUEST NO. 17**

15 All DOCUMENTS CONCERNING any INSPECTIONS conducted at the PREMISES
16 from July 2024 to the present.
17

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.
5

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**

5
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
28

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.
10

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**
16

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.
5

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:
15

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.
23

24 **REQUEST NO. 24**

25 All DOCUMENTS that reflect the name and legal identity of the PERSON or entity listed
26 as the owner of record for the PREMISES with the Los Angeles County Assessor's Office.
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28

1 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 24**

2 As part of this meet and confer process, Responding Party requests that Propounding
3 Party define the term “legal identity,” “entity.” Because this request is compound, Responding
4 Party requests that Propounding Party separate this request into distinct asks. Notwithstanding
5 and without waiving the foregoing objections, Responding Party responds as follows:
6

7 Responding Party produces all relevant documents in Responding Party’s possession or
8 control which are attached hereto or sent concurrently with these responses. Discovery is
9 ongoing and it is anticipated that additional discovery and further investigation, legal research
10 and analysis will supply additional facts and provide new and different meaning to known facts,
11 and may establish new factual conclusions and legal contentions, all of which may result in
12 additional changes and/or variations from the responses set herein and Responding Party reserves
13 the right to supplement this response at a later time as appropriate, up to and including at trial.
14

15 **REQUEST NO. 25**

16 All DOCUMENTS reflecting any COMMUNICATIONS YOU received from the
17 California Civil Rights Department (CRD) CONCERNING DEFENDANT or the PREMISES.
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19 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 25**

20 As part of this meet and confer process, Responding Party requests that Propounding
21 Party define the term “reflecting.” Responding Party requests that Propounding Party narrow the
22 scope of this request to a reasonable timeframe. Because this request is compound, Responding
23 Party requests that Propounding Party separate this request into distinct asks. Additionally, this
24 request seeks confidential, private and/or privileged documents of third parties not part of this
25 Action, the disclosure of which would violate their right to privacy. This request seeks
26 information protected by disclosure by the attorney-client privilege and/or work-product doctrine
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1 and/or information prepared in anticipation of litigation, including physician-patient privilege.
2 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
3 follows:

4 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
5 with this request as propounded. Discovery is ongoing and it is anticipated that additional
6 discovery and further investigation, legal research and analysis will supply additional facts and
7 provide new and different meaning to known facts, and may establish new factual conclusions
8 and legal contentions, all of which may result in additional changes and/or variations from the
9 responses set herein and Responding Party reserves the right to supplement this response at a
10 later time as appropriate, up to and including at trial.
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13 DATED: 6/6/2025

MARINACCIO LAW

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15 BY: Anthony Marinaccio

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17 Anthony Marinaccio, Esq.
18 Attorney for Plaintiffs,
19 Bradford M. Martinez; Vicki L. Martinez; Gail
20 Diane Calhoun aka Gail 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 Responses to Request for Production of

6 Documents and know its 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.

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

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

11 true and correct.

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13 Type or Print Name: Bradford M. Martinez

14 Signature Bradford Martinez

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