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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**

13 BRADFORD M. MARTINEZ; VICKI L.)	CASE NO. 25PDUD00999
14 MARTINEZ; GAIL DIANE CALHOUN)	
15 AKA GAIL DIANE HOUSER)	[Assigned for all purposes to the Hon.
16 Plaintiffs,)	Jerry B. Marshak, Dept. R]
17 v.)	
18 JENNIFER BURBANK; JAMES)	PLAINTIFF'S SUPPLEMENTAL
19 BURBANK)	RESPONSE TO REQUEST FOR
20 Defendants,)	ADMISSIONS
21)	Complaint Filed: April 1, 2025
22)	Trial Date: June 12, 2025
23)	

24 PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

25 RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ

26 SET NO.: One

27 BRADFORD M. MARTINEZ ("Responding Party") hereby provides its supplemental
28 responses to JENNIFER BURBANK'S ("Propounding Party") Requests for Admission (Set One)
as follows:

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Plaintiff is Responding to all Requests to the extent that information has become known by it. 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 it.

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.

PLAINTIFF'S SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSIONS - 2

1 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks the
2 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
3 calculated to lead to the discovery of admissible evidence.

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5 B. CONFIDENTIALITY/PRIVACY OBJECTION

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

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10 C. OVERBREADTH AND BURDEN OBJECTION

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

21 D. AMBIGUITY OBJECTION

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

26 E. AVAILABILITY OBJECTION

27 Responding Party objects on the basis that the interrogatory is equally accessible to all parties
28 or is more accessible to the Propounding Party or which is maintained primarily by persons or

1 entities other than Responding Party.

2 F. IMPROPER FORM OBJECTION

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

7 G. LEGAL CONCLUSION OBJECTION

8 Responding Party objects on the basis that the interrogatory calls for a legal conclusion.

9 H. ATTORNEY WORK-PRODUCT OBJECTION

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

12 I. MARITAL PRIVILEGE OBJECTION

13 Responding Party objects on the basis that the request, in whole or in part, seeks
14 disclosure of information that is protected under marital privilege.

15 **REQUEST FOR ADMISSION NO. 2:**

16 Admit that prior to June 2024, PLAINTIFF had not informed DEFENDANT of any intent
17 to recover possession of the PREMISES.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 2**

19 As part of this meet and confer process, Responding Party requests that Propounding
20 Party define the term “recover possession.” Notwithstanding and without waiving the foregoing
21 objections, Responding Party responds as follows:

22 Admit. Discovery is ongoing and it is anticipated that additional discovery and further
23 investigation, legal research and analysis will supply additional facts and provide new and different
24 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
25 which may result in additional changes and/or variations from the responses set herein and
26 Responding Party reserves the right to supplement this response at a later time as appropriate, up
27 to and including at trial.
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1 **REQUEST FOR ADMISSION NO. 3:**

2 Admit that on or about June 19, 2024, PLAINTIFF served DEFENDANT with a notice of
3 non-renewal of the RENTAL AGREEMENT.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 3**

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

9 Admit, to the extent indicated in the e-mail bearing the subject “Lease Termination of 518
10 N. Stoneman Ave. Alhambra CA 91801” which is attached hereto or sent concurrently with these
11 supplemental responses. Discovery is ongoing and it is anticipated that additional discovery and
12 further investigation, legal research and analysis will supply additional facts and provide new and
13 different meaning to known facts, and may establish new factual conclusions and legal contentions,
14 all of 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.

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19 **REQUEST FOR ADMISSION NO. 4:**

20 Admit that the June 19, 2024 notice of non-renewal stated that DEFENDANT had violated
21 the RENTAL AGREEMENT by allegedly modifying bathroom and keeping a pet.

22 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 4**

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24 As part of this meet and confer process, Responding Party requests that Propounding Party
25 define the term “notice of non-renewal,” “modifying bathroom,” “pet.” Notwithstanding and
26 without waiving the foregoing objections, Responding Party responds as follows:
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