

1 and any other objections and grounds that would require the exclusion of any statement herein if
2 any document was asked of, or if any statement contained therein were made by a witness present
3 and testifying in court, all of which objections and grounds are reserved and may be interposed at
4 the time of trial.

5
6 Plaintiff is Responding to all Requests to the extent that information has become known
7 by it. However, this Responding Party's discovery, investigation and preparation for trial of this
8 matter has not been completed as of the date of these responses, and, therefore, Plaintiff does not
9 purport to state anything more than information presently known and discovered by it.

10
11 Plaintiff, in responding to these Requests, reserves the right to continue discovery and
12 investigation in this matter for facts, witnesses and supporting data that may recall information
13 which, if it had presently within its knowledge, would be included in these responses. For example,
14 to the extent that any request calls for the identification of all documents," it is responded to fully
15 insofar as information is presently available to Plaintiff, and Plaintiff is not precluded from
16 presenting at trial information discovered after the date of the response of this request.

17
18 This preliminary statement is incorporated into each of the responses set forth below.

19
20 **GENERAL OBJECTIONS**

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

24 **A. RELEVANCY OBJECTION**

25 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks the
26 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
27 calculated to lead to the discovery of admissible evidence.
28

1 B. CONFIDENTIALITY/PRIVACY OBJECTION

2 Responding Party objects on the basis that the interrogatory seeks the disclosure of confidential
3 information and constitutes an attempt to invade the personal and/or financial privacy of certain
4 individuals or persons.
5

6 C. OVERBREADTH AND BURDEN OBJECTION

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

19 D. AMBIGUITY OBJECTION

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

25 E. AVAILABILITY OBJECTION

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

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

8 G. LEGAL CONCLUSION OBJECTION

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

11 H. ATTORNEY WORK-PRODUCT OBJECTION

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

15 I. MARITAL PRIVILEGE OBJECTION

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

18 **REQUEST FOR ADMISSION NO. 1:**

19 Admit that PLAINTIFF is not the owner of the PROPERTY.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 1**

22 Deny.

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

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

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 2**

1 Responding Party objects to this request on the grounds that it is vague and ambiguous
2 regarding the term “recover possession.” Responding Party objects to this request on the grounds
3 that it is not reasonably limited in scope or time. Additionally, this request is not reasonably
4 calculated to lead to the discovery of admissible or relevant evidence and it is overbroad,
5 burdensome, and oppressive and is only designed to harass Responding Party. Notwithstanding
6 and without waiving the foregoing objections, Responding Party responds as follows:
7

8 Responding Party made a reasonable inquiry and the information it knows or can readily
9 obtain is insufficient to enable it to admit or deny. Discovery is ongoing and it is anticipated that
10 additional discovery and further investigation, legal research and analysis will supply additional
11 facts and provide new and different meaning to known facts, and may establish new factual
12 conclusions and legal contentions, all of which may result in additional changes and/or variations
13 from the responses set herein and Responding Party reserves the right to supplement this response
14 at a later time as appropriate, up to and including at trial.

15 **REQUEST FOR ADMISSION NO. 3:**

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

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 3**

19 Responding Party objects to this request on the grounds that it is vague and ambiguous
20 regarding the term “served,” “notice of non-renewal.” Responding Party objects to this request on
21 the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the
22 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressive and
23 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
24 objections, Responding Party responds as follows:
25

26 Responding Party is unable to comply with this request as propounded. Responding Party
27 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
28

1 enable it to admit or deny. 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
8 **REQUEST FOR ADMISSION NO. 4:**

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

11
12 **RESPONSE TO REQUEST FOR ADMISSION NO. 4**

13 Responding Party objects to this request on the grounds that it is vague and ambiguous
14 regarding the term “notice of non-renewal,” “modifying bathroom,” “pet.” Responding Party
15 objects to this request on the grounds that it is not reasonably calculated to lead to the discovery
16 of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and is only
17 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
18 objections, Responding Party responds as follows:

19
20 Responding Party is unable to comply with this request as propounded. Responding Party
21 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
22 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
23 further investigation, legal research and analysis will supply additional facts and provide new and
24 different meaning to known facts, and may establish new factual conclusions and legal contentions,
25 all of which may result in additional changes and/or variations from the responses set herein and
26
27
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 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that the June 19, 2024 notice of non-renewal did not state that PLAINTIFF or
5 PLAINTIFF's relative intended to move into the PREMISES.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 5**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous
8 regarding the term “notice of non-renewal,” “relative.” Responding Party objects to this request
9 on the grounds that it is not reasonably calculated to lead to the discovery of admissible or relevant
10 evidence and it is overbroad, burdensome, and oppressing and is only designed to harass
11 Responding Party. Notwithstanding and without waiving the foregoing objections, Responding
12 Party responds as follows:

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

21 **REQUEST FOR ADMISSION NO. 6:**

22 Admit that the NOTICE served on or about January 30, 2025, was the first written
23 communication to DEFENDANT stating that Robert L. Fernandez intended to occupy the
24

1 PREMISES.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 6**

3 Responding Party objects to this request on the grounds that it is vague and ambiguous
4 regarding the term “first written communication.” Responding Party objects to this request on the
5 grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the discovery
6 of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and is only
7 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
8 objections, Responding Party responds as follows:
9

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

19
20 **REQUEST FOR ADMISSION NO. 7**

21 Admit that DEFENDANT submitted written REPAIR REQUESTS to PLAINTIFF or the
22 PROPERTY MANAGER in September 2024 concerning water intrusion at the PREMISES.
23

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 7**

25 Responding Party objects to this request on the grounds that it is vague and ambiguous
26 regarding the term “written,” “concerning,” “water intrusion.” Responding Party objects to this
27 request on the grounds that it is not reasonably limited in scope or time, not reasonably calculated
28

1 to lead to the discovery of admissible or relevant evidence and it is compound, overbroad,
2 burdensome, and oppressing and is only designed to harass Responding Party. Notwithstanding
3 and without waiving the foregoing objections, Responding Party responds as follows:

4 Responding Party is unable to comply with this request as propounded. Responding Party
5 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
6 enable it to admit or deny. 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 and
8 different meaning to known facts, and may establish new factual conclusions and legal contentions,
9 all of which may result in additional changes and/or variations from the responses set herein and
10 Responding Party reserves the right to supplement this response at a later time as appropriate, up
11 to and including at trial.

14 **REQUEST FOR ADMISSION NO. 8:**

15 Admit that DEFENDANT submitted additional REPAIR REQUESTS between December
16 2024 and January 2025 concerning unresolved issues at the PREMISES.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 8**

19 Responding Party objects to this request on the grounds that it is vague and ambiguous
20 regarding the term “additional,” “concerning,” “unresolved issues.” Responding Party objects to
21 this request on the grounds that it is not reasonably limited in scope, not reasonably calculated to
22 lead to the discovery of admissible or relevant evidence and it is compound, overbroad,
23 burdensome, and oppressing and is only designed to harass Responding Party. Notwithstanding
24 and without waiving the foregoing objections, Responding Party responds as follows:

26 Responding Party is unable to comply with this request as propounded. Responding Party
27 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
28

1 enable it to admit or deny. 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
8 **REQUEST FOR ADMISSION NO. 9:**

9 Admit that PLAINTIFF did not complete REPAIRS to address water intrusion at the
10 PREMISES before serving the NOTICE.

11
12 **RESPONSE TO REQUEST FOR ADMISSION NO. 9**

13 Responding Party objects to this request on the grounds that it is vague and ambiguous
14 regarding the term “complete,” “water intrusion.” Responding Party objects to this request on the
15 grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead to the
16 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
17 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
18 objections, Responding Party responds as follows:

19
20 Responding Party is unable to comply with this request as propounded. Responding Party
21 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
22 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
23 further investigation, legal research and analysis will supply additional facts and provide new and
24 different meaning to known facts, and may establish new factual conclusions and legal contentions,
25 all of which may result in additional changes and/or variations from the responses set herein and
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27
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 **REQUEST FOR ADMISSION NO. 10:**

4 Admit that DEFENDANT submitted a COMPLAINT to the California Civil Rights
5 Department in or about September 2024 regarding the condition of the PREMISES.
6

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 10**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “submitted “regarding,” “condition.” Responding Party objects to this request
10 on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the
11 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
12 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
13 objections, Responding Party responds as follows:
14

15 Responding Party is unable to comply with this request as propounded. Responding Party
16 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
17 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
18 further investigation, legal research and analysis will supply additional facts and provide new and
19 different meaning to known facts, and may establish new factual conclusions and legal contentions,
20 all of which may result in additional changes and/or variations from the responses set herein and
21 Responding Party reserves the right to supplement this response at a later time as appropriate, up
22 to and including at trial.
23
24

25 **REQUEST FOR ADMISSION NO. 11:**

26 Admit that DEFENDANT submitted a COMPLAINT to the Los Angeles County
27 Department of Public Health in or about October 2024 regarding the condition of the PREMISES.
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 11**

2 Responding Party objects to this request on the grounds that it is vague and ambiguous
3 regarding the term “submitted “regarding,” “condition.” Responding Party objects to this request
4 on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the
5 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
6 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
7 objections, Responding Party responds as follows:
8

9 Responding Party is unable to comply with this request as propounded. Responding Party
10 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
11 enable it to admit or deny. 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.
17
18

19 **REQUEST FOR ADMISSION NO. 12:**

20 Admit that DEFENDANT followed up in writing with PLAINTIFF regarding REPAIRS
21 to the PREMISES on or about January 28, 2025.
22

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 12**

24 Responding Party objects to this request on the grounds that it is vague and ambiguous
25 regarding the term “writing,” “regarding.” Responding Party objects to this request on the grounds
26 that it is not reasonably limited in scope, not reasonably calculated to lead to the discovery of
27 admissible or relevant evidence and it is overbroad, burdensome, and oppressing and is only
28

1 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
2 objections, Responding Party responds as follows:

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

11
12
13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that PLAINTIFF served the NOTICE within three days after DEFENDANT's
15 January 2025 follow-up communication requesting REPAIRS.

16
17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13**

18 Responding Party objects to this request on the grounds that it is vague and ambiguous
19 regarding the term “follow-up communication,” “requesting.” Responding Party objects to this
20 request on the grounds that it is not reasonably limited in scope, not reasonably calculated to lead
21 to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and
22 oppressing and is only designed to harass Responding Party. Notwithstanding and without waiving
23 the foregoing objections, Responding Party responds as follows:

24
25 Responding Party is unable to comply with this request as propounded. Responding Party
26 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
27 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
28

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

7 **REQUEST FOR ADMISSION NO. 14:**

8 Admit that DEFENDANT's habitability-related COMPLAINTS and REPAIR REQUESTS
9 constitute PROTECTED ACTIVITY under California law.
10

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 14**

12 Responding Party objects to this request on the grounds that it is vague and ambiguous
13 regarding the term "habitability-related," "California law." Responding Party objects to this
14 request on the grounds that it is vague and ambiguous regarding the term "habitability-related" as
15 it calls for a legal conclusion. Responding Party objects to this request on the grounds that it is not
16 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible
17 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
18 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
19 objections, Responding Party responds as follows:
20

21 Responding Party is unable to comply with this request as propounded. Responding Party
22 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
23 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
24 further investigation, legal research and analysis will supply additional facts and provide new and
25 different meaning to known facts, and may establish new factual conclusions and legal contentions,
26 all of which may result in additional changes and/or variations from the responses set herein and
27
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 **REQUEST FOR ADMISSION NO. 15:**

4 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the
5 California Civil Rights Department before serving the NOTICE.
6

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 15**

8 Responding Party objects to this request on the grounds that it is vague and ambiguous
9 regarding the term “knowledge.” Responding Party objects to this request on the grounds that it is
10 vague and ambiguous regarding the term “COMPLAINT” as the term is defined by Propounding
11 Party but used in this request. Responding Party objects to this request on the grounds that it is not
12 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible
13 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
14 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
15 objections, Responding Party responds as follows:
16
17

18 Responding Party is unable to comply with this request as propounded. Responding Party
19 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
20 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
21 further 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 contentions,
23 all of which may result in additional changes and/or variations from the responses set herein and
24 Responding Party reserves the right to supplement this response at a later time as appropriate, up
25 to and including at trial.
26

27 **REQUEST FOR ADMISSION NO. 16:**
28

1 Admit that PLAINTIFF had knowledge of DEFENDANT's written COMPLAINT to the
2 Los Angeles County Department of Public Health before serving the NOTICE.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 16**

4 Responding Party objects to this request on the grounds that it is vague and ambiguous
5 regarding the term “knowledge.” Responding Party objects to this request on the grounds that it is
6 vague and ambiguous regarding the term “COMPLAINT” as the term is defined by Propounding
7 Party but used in this request. Responding Party objects to this request on the grounds that it is not
8 reasonably limited in scope or time, not reasonably calculated to lead to the discovery of admissible
9 or relevant evidence and it is compound, overbroad, burdensome, and oppressive and is only
10 designed to harass Responding Party. Notwithstanding and without waiving the foregoing
11 objections, Responding Party responds as follows:
12

13
14 Responding Party is unable to comply with this request as propounded. Responding Party
15 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
16 enable it to admit or deny. 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

23
24 **REQUEST FOR ADMISSION NO. 17:**

25 Admit that no DOCUMENT served by PLAINTIFF prior to January 30, 2025, referenced
26 any intention by Robert L. Fernandez to move into the PREMISES.
27

28 **RESPONSE TO REQUEST FOR ADMISSION NO. 17**

1 Responding Party objects to this request on the grounds that it is vague and ambiguous
2 regarding the term “no DOCUMENT,” “any intention.” Responding Party objects to this request
3 on the grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead
4 to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and
5 oppressing and is only designed to harass Responding Party. Notwithstanding and without waiving
6 the foregoing objections, Responding Party responds as follows:
7

8 Responding Party is unable to comply with this request as propounded. Responding Party
9 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
10 enable it to admit or deny. 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
17

18 **REQUEST FOR ADMISSION NO. 18:**

19 Admit that the reasons given in the June 2024 non renewal notice are different from the
20 reasons given in the January 2025 NOTICE.
21

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 18**

23 Responding Party objects to this request on the grounds that it is vague and ambiguous
24 regarding the term “reasons,” “non-renewal notice.” Responding Party objects to this request on
25 the grounds that it is not reasonably limited in scope, not reasonably calculated to lead to the
26 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
27
28

1 is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing
2 objections, Responding Party responds as follows:

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

11
12
13 **REQUEST FOR ADMISSION NO. 19:**

14 Admit that DEFENDANT was in possession of the PREMISES for more than three years
15 before the NOTICE was served.

16
17 **RESPONSE TO REQUEST FOR ADMISSION NO. 19**

18 Responding Party objects to this request on the grounds that it is vague and ambiguous
19 regarding the term “possession.” Responding Party objects to this request on the grounds that it is
20 not reasonably calculated to lead to the discovery of admissible or relevant evidence and it is
21 overbroad, burdensome, and oppressive and is only designed to harass Responding Party.
22 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
23 follows:

24
25 Deny, to the extent of the term listed in the underlying lease for the PREMISES. Discovery
26 is ongoing and it is anticipated that additional discovery and further investigation, legal research
27 and analysis will supply additional facts and provide new and different meaning to known facts,
28

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

4 **REQUEST FOR ADMISSION NO. 20:**

5
6 Admit that PLAINTIFF has not produced any DOCUMENT confirming a scheduled
7 move-in date for Robert L. Fernandez.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 20**

9 Responding Party objects to this request on the grounds that it is vague and ambiguous
10 regarding the term “produced,” “confirming.” Responding Party objects to this request on the
11 grounds that it is not reasonably limited in scope or time, not reasonably calculated to lead to the
12 discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressing and
13 is only designed to harass Responding Party. As phrased, it is unclear to whom this request
14 concerns with respect to referenced production. Notwithstanding and without waiving the
15 foregoing objections, Responding Party responds as follows:
16
17

18 Responding Party is unable to comply with this request as propounded. Responding Party
19 made a reasonable inquiry and the information it knows or can readily obtain is insufficient to
20 enable it to admit or deny. Discovery is ongoing and it is anticipated that additional discovery and
21 further 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 contentions,
23 all of which may result in additional changes and/or variations from the responses set herein and
24 Responding Party reserves the right to supplement this response at a later time as appropriate, up
25 to and including at trial.
26
27
28

RESPONSE TO REQUEST FOR ADMISSION NO. 21

Admit.

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

Responding Party objects to this request on the grounds that it is vague and ambiguous regarding the term “assisted living facility.” Responding Party objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible or relevant evidence and it is overbroad, burdensome, and oppressive and is only designed to harass Responding Party. Notwithstanding and without waiving the foregoing objections, Responding Party responds as follows: Deny.

MARINACCIO LAW

BY: /S/

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