

<u>10/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>October 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>11/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>November 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>12/1/2024</u>	<u>Rent paid to Lotus</u> <u>Property Management</u>	<u>December 2024 Rent</u>	<u>\$ 3,250.00</u>
<u>12/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for</u> <u>January Rent - Part 1</u> <u>of 2"; Conf#</u> <u>99atqz8ws"</u>	<u>January 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>12/30/2024</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for</u> <u>January rent - Part 2</u> <u>of 2"; Conf#</u> <u>99ats9vkh"</u>	<u>January 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>1/31/2025</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for 518</u> <u>stoneman february</u> <u>rent - part 1 of 2";</u> <u>Conf# 99awlsqtr"</u>	<u>February 2025 Rent</u>	<u>\$ 1,625.00</u>
<u>2/3/2025</u>	<u>Zelle payment from</u> <u>JENNIFER</u> <u>BURBANK for 518</u> <u>stoneman february</u> <u>rent - part 2 of 2";</u> <u>Conf# 99awp9ekt"</u>	<u>February 2025 Rent</u>	<u>\$ 1,625.00</u>

Discovery is ongoing and it is anticipated that additional discovery and 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, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as

appropriate, up to and including at trial.

FORM INTERROGATORY 71.4

No.

FORM INTERROGATORY 71.5

No.

FORM INTERROGATORY 71.6

No.

FORM INTERROGATORY 71.7

Not to Responding Party's current knowledge. Responding Party exercises its right to produce writings under Code of Civil Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and 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, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

FORM INTERROGATORY 72.2

Yes, via registered process server. Responding Party exercises its right to produce writings under Code of Civil Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and 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, all of which may result in additional changes and/or variations from the responses set herein and Responding Party reserves the right to supplement this response at a later time as appropriate, up to and including at trial.

1 FORM INTERROGATORY 73.1

2 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
3 a defendant denies allegations that defendant’s continued possession is malicious, then either
4 party may ask any applicable question in this section.” No allegation is made in the underlying
5 unlawful detainer complaint bearing case number 25PDUD00999 (“Action”) that defendant’s
6 continued possession is malicious. Given the current state of the facts, this question is not
7 designed to lead to the discovery of admissible evidence.
8

9 FORM INTERROGATORY 73.2

10 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
11 a defendant denies allegations that defendant’s continued possession is malicious, then either
12 party may ask any applicable question in this section.” No allegation is made in the Action that
13 defendant’s continued possession is malicious. Given the current state of the facts, this question
14 is not designed to lead to the discovery of admissible evidence.
15

16 FORM INTERROGATORY 73.3

17 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
18 a defendant denies allegations that defendant’s continued possession is malicious, then either
19 party may ask any applicable question in this section.” No allegation is made in the underlying
20 unlawful detainer complaint bearing case number 25PDUD00999 (“Action”) that defendant’s
21 continued possession is malicious. Given the current state of the facts, this question is not
22 designed to lead to the discovery of admissible evidence.
23

24 FORM INTERROGATORY 74.1

25 Yes.
26

27 FORM INTERROGATORY 74.2
28

1 (a) The Tenant Protection Act of 2019, codified at California Civil Code Section 1946.2;

2 (b) California.

3 FORM INTERROGATORY 74.3

4 No.

5 FORM INTERROGATORY 74.4

6 Yes.

7 a. Robert Fernandez;

8 b. 1 E Commonwealth Ave, Alhambra, CA 91801; 1220 Mariposa St, Glendale, CA 91205;

9 c. Father/Father-in-Law;

10 d. Return to the RENTAL UNIT which he previously resided in;

11 e. None. See response to FORM Interrogatory-UD No. 70.6 herein.

12 FORM INTERROGATORY 74.5

13 No. Responding Party exercises its right to produce writings under Code of Civil
14 Procedure Section 2030.210(a)(2). 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 FORM INTERROGATORY 74.6

21 No.

22 FORM INTERROGATORY 75.1

23 OBJECTION. Relevance. The prefatory statement which proceeds this section states, "If

1 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
2 or express breach of warranty to provide habitable residential premises, then either party may ask
3 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
4 Action. Given the current state of the facts, this question is not designed to lead to the discovery
5 of admissible evidence.
6

7 FORM INTERROGATORY 75.2

8 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
9 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
10 or express breach of warranty to provide habitable residential premises, then either party may ask
11 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
12 Action. Given the current state of the facts, this question is not designed to lead to the discovery
13 of admissible evidence.
14

15 FORM INTERROGATORY 75.3

16 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
17 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
18 or express breach of warranty to provide habitable residential premises, then either party may ask
19 any applicable question in this section.” Plaintiff has not alleged nonpayment of rent in this
20 Action. Given the current state of the facts, this question is not designed to lead to the discovery
21 of admissible evidence.
22

23 FORM INTERROGATORY 75.4

24 OBJECTION. Relevance. The prefatory statement which proceeds this section states, “If
25 plaintiff alleges nonpayment of rent and defendant bases his defenses on allegations of implied
26 or express breach of warranty to provide habitable residential premises, then either party may ask
27
28