

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:
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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.
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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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