

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

6 **REQUEST NO. 24**

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

9 **RESPONSE TO REQUEST NO. 24**

10 Responding Party objects to this request on the grounds that it is vague and ambiguous  
11 regarding the term “legal entity.” Responding Party objects to this request on the grounds that it  
12 is not reasonably limited in scope or time. Furthermore, this request is not reasonably calculated  
13 to lead to the discovery of admissible or relevant evidence and it is compound, overbroad,  
14 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party  
15 further objects to this request on the grounds that a response would necessitate the preparation or  
16 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.  
17 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged  
18 documents of third parties not part of this Action, the disclosure of which would violate their  
19 right to privacy. This request seeks information protected by disclosure by the attorney-client  
20 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation,  
21 including physician-patient privilege. Notwithstanding and without waiving the foregoing  
22 objections, Responding Party responds as follows:

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

8 **REQUEST NO. 25**

9 All DOCUMENTS reflecting any COMMUNICATIONS YOU received from the  
10 California Civil Rights Department (CRD) CONCERNING DEFENDANT or the PREMISES.

11 **RESPONSE TO REQUEST NO. 25**

12 Responding Party objects to this request on the grounds that it is vague and ambiguous  
13 regarding the term "reflecting." Responding Party objects to this request on the grounds that it is  
14 not reasonably limited in scope or time. Furthermore, this request is not reasonably calculated to  
15 lead to the discovery of admissible or relevant evidence and it is compound, overbroad,  
16 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party  
17 further objects to this request on the grounds that a response would necessitate the preparation or  
18 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.  
19 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged  
20 documents of third parties not part of this Action, the disclosure of which would violate their  
21 right to privacy. This request seeks information protected by disclosure by the attorney-client  
22 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation,

1 including physician-patient privilege. Notwithstanding and without waiving the foregoing  
2 objections, 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.

10 **REQUEST NO. 26**

11       All DOCUMENTS reflecting any COMMUNICATIONS YOU sent to the California Civil  
12 Rights Department (CRD) in response to a COMPLAINT made by DEFENDANT.

13 **RESPONSE TO REQUEST NO. 26**

14       Responding Party objects to this request on the grounds that it is vague and ambiguous  
15 regarding the term “reflecting.” Responding Party objects to this request on the grounds that it is  
16 not reasonably limited in scope or time. Furthermore, this request is not reasonably calculated to  
17 lead to the discovery of admissible or relevant evidence and it is compound, overbroad,  
18 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party  
19 further objects to this request on the grounds that a response would necessitate the preparation or  
20 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.  
21 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged  
22 documents of third parties not part of this Action, the disclosure of which would violate their  
right to privacy. This request seeks information protected by disclosure by the attorney-client

1 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation,  
2 including physician-patient privilege. Notwithstanding and without waiving the foregoing  
3 objections, Responding Party responds as 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.

11 **REQUEST NO. 27**

12       All DOCUMENTS reflecting any COMMUNICATIONS YOU received from the Los  
13 Angeles County Department of Public Health CONCERNING DEFENDANT or the PREMISES.

14 **RESPONSE TO REQUEST NO. 27**

15       Responding Party objects to this request on the grounds that it is vague and ambiguous  
16 regarding the term “reflecting.” Responding Party objects to this request on the grounds that it is  
17 not reasonably limited in scope or time. Furthermore, this request is not reasonably calculated to  
18 lead to the discovery of admissible or relevant evidence and it is compound, overbroad,  
19 burdensome, and oppressive and is only designed to harass Responding Party. Responding Party  
20 further objects to this request on the grounds that a response would necessitate the preparation or  
21 the making of a compilation, abstract, audit, or summary of information. See Cal. Code Civ.  
22 Proc. Section 2030.230. Additionally, this request seeks confidential, private and/or privileged  
documents of third parties not part of this Action, the disclosure of which would violate their

1 right to privacy. This request seeks information protected by disclosure by the attorney-client  
2 privilege and/or work-product doctrine and/or information prepared in anticipation of litigation,  
3 including physician-patient privilege. Notwithstanding and without waiving the foregoing  
4 objections, Responding Party responds as follows:

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

12 **REQUEST NO. 28**

13       All DOCUMENTS reflecting any COMMUNICATIONS YOU sent to the Los Angeles  
14 County Department of Public Health in response to any complaint or inquiry involving the  
15 PREMISES or DEFENDANT.

16 **RESPONSE TO REQUEST NO. 28**

17       Responding Party objects to this request on the grounds that it is vague and ambiguous  
18 regarding the term “reflecting,” “complaint,” “inquiry.” Responding Party objects to this request  
19 on the grounds that it is not reasonably limited in scope or time. Furthermore, this request is not  
20 reasonably calculated to lead to the discovery of admissible or relevant evidence and it is  
21 compound, overbroad, burdensome, and oppressing and is only designed to harass Responding  
22 Party. Responding Party further objects to this request on the grounds that a response would  
necessitate the preparation or the making of a compilation, abstract, audit, or summary of

1 information. See Cal. Code Civ. Proc. Section 2030.230. Additionally, this request seeks  
2 confidential, private and/or privileged documents of third parties not part of this Action, the  
3 disclosure of which would violate their right to privacy. This request seeks information protected  
4 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information  
5 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and  
6 without waiving the foregoing objections, Responding Party responds as follows:

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

14 DATED: 5/30/2025

MARINACCIO LAW

15 BY: /S/\_\_\_\_\_

16 Anthony Marinaccio, Esq.  
17 Attorney for Plaintiffs,  
18 Bradford M. Martinez; Vicki L. Martinez; Gail  
19 Diane Calhoun aka Gail Diane Houser  
20  
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