

1 Responding Party requests that Propounding Party separate this request into distinct asks.

2 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
3 follows:

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

11 **REQUEST NO. 3**

12 All DOCUMENTS relating to the physical condition or medical needs of Robert L.
13 Fernandez between July 2024 and the present, including any DOCUMENTS reflecting his
14 residency in any ASSISTED LIVING FACILITY.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 3**

16 As part of this meet and confer process, Responding Party requests that Propounding
17 Party define the term "relating," "physical condition," "medical needs," "reflecting" "residency."
18 Because this request is compound, Responding Party requests that Propounding Party separate
19 this request into distinct asks. Additionally, this request seeks confidential, private and/or
20 privileged documents of third parties not part of the present unlawful detainer matter bearing
21 case number 25PDUD00999 ("Action"), the disclosure of which would violate their right to
22 privacy. This request seeks information protected by disclosure by the attorney-client privilege
23 and/or work-product doctrine and/or information prepared in anticipation of litigation, including
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1 physician-patient privilege. Notwithstanding and without waiving the foregoing objections,
2 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.
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12 **REQUEST NO. 4**

13 All DOCUMENTS YOU relied upon in preparing, drafting, or serving the NOTICE.

14 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 4**

15 As part of this meet and confer process, because this request is compound, Responding
16 Party requests that Propounding Party separate this request into distinct asks. Additionally, this
17 request seeks confidential, private and/or privileged documents of third parties not part of the
18 Action, the disclosure of which would violate their right to privacy. This request seeks
19 information protected by disclosure by the attorney-client privilege and/or work-product doctrine
20 and/or information prepared in anticipation of litigation, including physician-patient privilege.
21 Notwithstanding and without waiving the foregoing objections, Responding Party responds as
22 follows:
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24 After a diligent search and a reasonable inquiry, Responding Party is unable to comply
25 with this request as propounded. Discovery is ongoing and it is anticipated that additional
26 discovery and further investigation, legal research and analysis will supply additional facts and
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1 provide new and different meaning to known facts, and may establish new factual conclusions
2 and legal contentions, all of which may result in additional changes and/or variations from the
3 responses set herein and Responding Party reserves the right to supplement this response at a
4 later time as appropriate, up to and including at trial.
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6 **REQUEST NO. 5**

7 All DOCUMENTS CONCERNING REPAIR REQUESTS made by DEFENDANT
8 between September 2024 and January 2025.

9 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 5**

10 Responding Party produces all relevant documents in Responding Party's possession or
11 control which are attached hereto or sent concurrently with these responses. Discovery is
12 ongoing and it is anticipated that additional discovery and further investigation, legal research
13 and analysis will supply additional facts and provide new and different meaning to known facts,
14 and may establish new factual conclusions and legal contentions, all of which may result in
15 additional changes and/or variations from the responses set herein and Responding Party reserves
16 the right to supplement this response at a later time as appropriate, up to and including at trial.
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18 **REQUEST NO. 6**

19 All DOCUMENTS CONCERNING any response by PLAINTIFF or PROPERTY
20 MANAGER to the REPAIR REQUESTS referenced in Request No. 5.
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22 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 6**

23 As part of this meet and confer process, Responding Party requests that Propounding Party
24 define the term "any response." Because this request is compound, Responding Party requests that
25 Propounding Party separate this request into distinct asks. Additionally, this request seeks
26 confidential, private and/or privileged documents of third parties not part of the Action, the
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1 disclosure of which would violate their right to privacy. This request seeks information protected
2 by disclosure by the attorney-client privilege and/or work-product doctrine and/or information
3 prepared in anticipation of litigation, including physician-patient privilege. Notwithstanding and
4 without waiving the foregoing objections, Responding Party responds as follows:

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

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14 **REQUEST NO. 7**

15 All DOCUMENTS CONCERNING water intrusion, moisture, mold, or plumbing issues
16 at the PREMISES from September 2024 to the present.

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18 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 7**

19 As part of this meet and confer process, Responding Party requests that Propounding Party
20 define the term "water intrusion," "moisture," "plumbing issues," "mold." Because this request is
21 compound, Responding Party requests that Propounding Party separate this request into distinct
22 asks. Additionally, this request seeks confidential, private and/or privileged documents of third
23 parties not part of the Action, the disclosure of which would violate their right to privacy. This
24 request seeks information protected by disclosure by the attorney-client privilege and/or work-
25 product doctrine and/or information prepared in anticipation of litigation, including physician-
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1 patient privilege. Notwithstanding and without waiving the foregoing objections, Responding
2 Party responds as follows:

3 Responding Party produces all relevant documents in Responding Party's possession or
4 control which are attached hereto or sent concurrently with these responses. Discovery is ongoing
5 and it is anticipated that additional discovery and further investigation, legal research and analysis
6 will supply additional facts and provide new and different meaning to known facts, and may
7 establish new factual conclusions and legal contentions, all of which may result in additional
8 changes and/or variations from the responses set herein and Responding Party reserves the right
9 to supplement this response at a later time as appropriate, up to and including at trial.
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12 **REQUEST NO. 8**

13 All COMMUNICATIONS between PLAINTIFF and DEFENDANT between September
14 1, 2024, and January 30, 2025.

15 **SUPPLEMENTAL RESPONSE TO REQUEST NO. 8**

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