

1 No. Discovery is ongoing and it is anticipated that additional discovery and further
2 investigation, legal research and analysis will supply additional facts and provide new and different
3 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
4 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 **SPECIAL INTERROGATORY NO. 27**

8 State whether YOU believe that DEFENDANT'S habitability-related COMPLAINTS
9 were a motivating factor in YOUR decision to serve the NOTICE.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 27**

11 Responding Party objects to this request on the grounds that it is vague and ambiguous
12 regarding the term "state," "habitability-related." Responding Party objects to this request on the
13 grounds that it is vague and ambiguous regarding the term "habitability" as it calls for a legal
14 conclusion. This interrogatory is compound, overbroad, vague, unduly burdensome, and
15 oppressive in scope and time. Responding Party also objects to this request to the extent that it
16 seeks information protected from disclosure by the attorney-client privilege and attorney work
17 product doctrine and/or premature disclosure of expert witness information in violation of *Code of*
18 *Civil Procedure* §§ 2018 and 2034. In addition, Responding Party also objects to this request on
19 the grounds that it seeks information that impairs a person's inalienable right of privacy under the
20 California Constitution and disclosure would violate Responding Party and the third parties' right
21 to privacy. Subject to the foregoing objections, and without waiving them, Responding Party
22 responds as follows:

23 No. Discovery is ongoing and it is anticipated that additional discovery and further
24 investigation, legal research and analysis will supply additional facts and provide new and different
25 meaning to known facts, and may establish new factual conclusions and legal contentions, all of
26 which may result in additional changes and/or variations from the responses set herein and

1 Responding Party reserves the right to supplement this response at a later time as appropriate, up
2 to and including at trial.

3 **SPECIAL INTERROGATORY NO. 28**

4 IDENTIFY all PERSONS involved in the preparation, drafting, or service of the
5 NOTICE.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 28**

7 Responding Party objects to this request on the grounds that it is vague and ambiguous
8 regarding the term “preparation,” “drafting.” Responding Party objects in that this request seeks
9 information equally available to Propounding Party and is already within the Propounding Party’s
10 possession thereby making the request overly burdensome, oppressive, and harassing. This
11 interrogatory is compound, duplicative of other discovery requests, overbroad, vague, unduly
12 burdensome, and oppressive in scope and time. Responding Party also objects to this request to the
13 extent that it seeks information protected from disclosure by the attorney-client privilege and
14 attorney work product doctrine and/or premature disclosure of expert witness information in
15 violation of *Code of Civil Procedure* §§ 2018 and 2034. In addition, Responding Party also objects
16 to this request on the grounds that it seeks information that impairs a person’s inalienable right of
17 privacy under the California Constitution and disclosure would violate Responding Party and the
18 third parties’ right to privacy. Subject to the foregoing objections, and without waiving them,
19 Responding Party responds as follows:

20 Responding Party exercises its right to produce writings under Code of Civil Procedure
21 Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional discovery and
22 further investigation, legal research and analysis will supply additional facts and provide new and
23 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.

23 **SPECIAL INTERROGATORY NO. 29**

1 State whether YOU or any PERSON acting on YOUR behalf made any statements
2 expressing frustration, concern, or annoyance about DEFENDANT'S REPAIR REQUESTS or
3 COMPLAINTS before the NOTICE was served.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 29**

5 Responding Party objects to this request on the grounds that it is vague and ambiguous
6 regarding the term "state," "any statements," "frustration," "concern," "annoyance." Responding
7 Party objects in that this request seeks information equally available to Propounding Party and is
8 already within the Propounding Party's possession thereby making the request overly burdensome,
9 oppressive, and harassing. This interrogatory is compound, overbroad, vague, unduly burdensome,
10 and oppressive in scope and time. Responding Party also objects to this request to the extent that
11 it seeks information protected from disclosure by the attorney-client privilege and attorney work
12 product doctrine and/or premature disclosure of expert witness information in violation of *Code of*
13 *Civil Procedure* §§ 2018 and 2034. In addition, Responding Party also objects to this request on
14 the grounds that it seeks information that impairs a person's inalienable right of privacy under the
15 California Constitution and disclosure would violate Responding Party and the third parties' right
16 to privacy. Subject to the foregoing objections, and without waiving them, Responding Party
17 responds as follows:

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

24 **SPECIAL INTERROGATORY NO. 30**

25 IDENTIFY all DOCUMENTS CONCERNING any complaints, comments, or statements
26 made by PLAINTIFF, PROPERTY MANAGER, or their agents CONCERNING

1 DEFENDANT'S REPAIR REQUESTS or COMPLAINTS made between September 2024 and
2 January 2025.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 30**

4 Responding Party objects to this request on the grounds that it is vague and ambiguous
5 regarding the term “complaints,” “comments,” “statements.” Responding Party objects to this
6 request on the grounds that it is vague and ambiguous regarding the term “agents” as it calls for a
7 legal conclusion. Responding Party objects in that this request seeks information equally available
8 to Propounding Party and is already within the Propounding Party’s possession thereby making the
9 request overly burdensome, oppressive, and harassing. This interrogatory is compound, overbroad,
10 vague, unduly burdensome, and oppressive in scope and time. Responding Party also objects to
11 this request to the extent that it seeks information protected from disclosure by the attorney-client
12 privilege and attorney work product doctrine and/or premature disclosure of expert witness
13 information in violation of *Code of Civil Procedure* §§ 2018 and 2034. In addition, Responding
14 Party also objects to this request on the grounds that it seeks information that impairs a person’s
15 inalienable right of privacy under the California Constitution and disclosure would violate
16 Responding Party and the third parties’ right to privacy. Subject to the foregoing objections, and
17 without waiving them, Responding Party responds as follows:

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

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DATED: 5/30/2025

MARINACCIO LAW

BY: /S/

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L. Martinez, and Gail Diane Calhoun AKA Gail
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