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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, PASADENA COURTHOUSE**

BRADFORD M. MARTINEZ; VICKI L.)	CASE NO. 25PDUD00999
MARTINEZ; GAIL DIANE CALHOUN)	
AKA GAIL DIANE HOUSER,)	[Assigned for all purposes to the Hon.
)	Jerry B. Marshak, Dept. R]
Plaintiffs,)	
)	PLAINTIFF'S SUPPLEMENTAL
v.)	RESPONSES TO DEFENDANT'S
)	REQUESTS FOR SPECIAL
JENNIFER BURBANK; JAMES)	INTERROGATORIES
BURBANK, and DOES 1-10,)	
)	Complaint Filed: April 1, 2025
Defendants,)	
)	Trial Date: June 12, 2025
)	

PROPOUNDING PARTY: DEFENDANT, JENNIFER BURBANK

RESPONDING PARTY: PLAINTIFF, BRADFORD M. MARTINEZ
SET NO.: One

BRADFORD M. MARTINEZ ("Responding Party") hereby provides its supplemental
response to JENNIFER BURBANK'S ("Propounding Party") Special Interrogatories (Set One) as
follows:

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Plaintiff is responding to all Requests to the extent that information has become known by him. However, this responding party's discovery, investigation and preparation for trial of this matter has not been completed as of the date of these responses, and, therefore, Plaintiff does not purport to state anything more than information presently known and discovered by him.

This preliminary statement is incorporated into each of the responses set forth below.

To avoid repetition in setting forth specific objections to interrogatories, responding party sets forth and incorporates the following objections to responding party's each and every response.

Responding party objects on the basis that the interrogatory, in whole or in part, seek the

1 disclosure of information that is neither relevant to the subject matter of the action nor reasonably
2 calculated to lead to the discovery of admissible evidence.

3 B. CONFIDENTIALITY/PRIVACY OBJECTION
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5 Responding party objects on the basis that the interrogatory seeks the disclosure of confidential
6 information and constitute an attempt to invade the personal and/or financial privacy of certain
7 individuals or persons.

8 C. OVERBREADTH AND BURDEN OBJECTION
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10 Responding party objects on the basis that the interrogatory is overbroad, burdensome and
11 oppressive in that they seek the disclosure of information that has little or no practical benefit to
12 propounding party while placing an unwarranted burden or expense on the responding party in
13 ascertaining such information. Further, such interrogatory is so broadly drawn that although it
14 may include some relevant information within its scope, it includes information that is irrelevant
15 or immaterial to the instant action. Such interrogatory seeks information which is cumulative
16 and/or would require the compilation of extensive and detailed information from numerous
17 potential sources, many of which is not easily identifiable or available. A search for all such
18 information will in many instances involve enormous amounts of time by responding party.
19 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.
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22 D. AMBIGUITY OBJECTION

23 Responding party objects on the basis that the interrogatory is phrased in language that is
24 vague, ambiguous, and uncertain such that responding party is unable to ascertain what
25 information is sought and in order to respond to this interrogatory, responding party would have
26 to speculate as to propounding party's intended meaning.
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28 E. AVAILABILITY OBJECTION

1 Responding party objects on the basis that the interrogatory is equally accessible to all parties
2 or is more accessible to the propounding party or which is maintained primarily by persons or
3 entities other than responding party.

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5 F. IMPROPER FORM OBJECTION

6 Responding party objects on the basis that the interrogatory is phrased in improper form
7 because the interrogatory is not “full and complete in and of itself”; or because it contains subpart,
8 “compound, conjunctive or disjunctive” question, such that the interrogatory does not comply with
9 the requirements of *California Code of Civil Procedure* §2030.060

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11 G. LEGAL CONCLUSION OBJECTION

12 Responding party objects on the basis that the interrogatory calls for a legal conclusion.

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14 H. ATTORNEY WORK-PRODUCT OBJECTION

15 Responding party objects on the basis that the interrogatory, in whole or in part,
16 seeks disclosure of information that is protected under the attorney work-product doctrine.

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18 I. MARITAL PRIVILEGE OBJECTION

19 Responding party objects on the basis that the request, in whole or in part, seek
20 disclosure of information that is protected under marital privilege.

21 **SPECIAL INTERROGATORY NO. 1**

22 State the date on which the RENTAL AGREEMENT between YOU and the
23 DEFENDANT was executed.

24 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 1**

25 Responding Party exercises its right to produce writings under Code of Civil Procedure
26 Section 2030.210(a)(2). See, Residential Lease or Month-to-Month Rental Agreement (“Lease”)
27 attached hereto or produced concurrently herewith. Said Lease was also attached as exhibit 1 to
28

1 Plaintiff's Complaint in the present unlawful detainer matter. Discovery is ongoing and it is
2 anticipated that additional discovery and further investigation, legal research and analysis will
3 supply additional facts and provide new and different meaning to known facts, and may establish
4 new factual conclusions and legal contentions, all of which may result in additional changes and/or
5 variations from the responses set herein and Responding Party reserves the right to supplement
6 this response at a later time as appropriate, up to and including at trial.
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8 **SPECIAL INTERROGATORY NO. 2**

9 IDENTIFY all DOCUMENTS that evidence the alleged service of the NOTICE on
10 DEFENDANT.
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12 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 2**

13 Responding Party exercises its right to produce writings under Code of Civil Procedure
14 Section 2030.210(a)(2). See, Proof of Service of Notice ("POS") attached hereto or produced
15 concurrently herewith. Said POS was also attached as exhibit 3 to Plaintiff's Complaint in the
16 present unlawful detainer matter. Discovery is ongoing and it is anticipated that additional
17 discovery and further investigation, legal research and analysis will supply additional facts and
18 provide new and different meaning to known facts, and may establish new factual conclusions and
19 legal contentions, all of which may result in additional changes and/or variations from the
20 responses set herein and Responding Party reserves the right to supplement this response at a later
21 time as appropriate, up to and including at trial.
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23 **SPECIAL INTERROGATORY NO. 3**

24 IDENTIFY all REPAIRS made at PREMISES during DEFENDANT's TENANCY at
25 PREMISES.
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27 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 3**

28 Responding Party exercises its right to produce writings under Code of Civil Procedure
Section 2030.210(a)(2), including but not limited to email exchanges attached hereto or produced