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{{ plaintiff }}

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF {{ county }}**

**{{ jurisdiction }}**

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| --- | --- | --- |
| {{ plaintiff }}, an individual,    Plaintiffs,  vs.  {{ defendant }}; and DOES 1-100, inclusive,  Defendants. |  | Case No.: {{ case\_no }}  Case Assigned to Hon. Joseph T. Ortiz  Department S17  **PLAINTIFF** {{ plaintiff }}**’S RESPONSES TO DEFENDANT’S REQUESTS FOR PRODUCTION, SET ONE**  **Complaint filed: {{ complaint\_date }}**  **Trial date : {{ trial\_date}}** |

PROPOUNDING PARTY: DEFENDANT, **{{ defendant }}**

RESPONDING PARTY: PLAINTIFF, {{ plaintiff }}

SET NO.: ONE

**TO DEFENDANT {{ defendant }} , AND ITS RESPECTIVE ATTORNEYS OF RECORD:**

Plaintiff {{ plaintiff }}, hereby responds and objects to Defendant’s First Set of Request for Production of Documents, as follows:

1. **PRELIMINARY STATEMENT**

1. Plaintiff has not completed its investigation or discovery in this action. As discovery proceeds, facts, information, evidence, documents and other tangible things may be discovered which are not known and, therefore, are not discussed or set forth in this Response; but which may be responsive to this set of Request. This Response is based on Plaintiff’s knowledge, information, and belief at this time and is complete as to its best knowledge and understanding at this time. This Response was prepared based on Plaintiff’s good faith interpretation and understanding of the individual Request contained within this set and is subject to correction for inadvertent errors or admissions, if any. Plaintiff reserves the right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of trial, any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents and things in this Response. Plaintiff assumes no obligation to voluntarily supplement or amend this Response to reflect facts, evidence, documents or tangible things discovered following service of this response. Nevertheless, this Response is given without prejudice to subsequent revision or supplementation based upon any facts, evidence, and documentation that hereafter may be discovered.

2. To the extent any question in this set of Request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence, Plaintiff declines to produce such information on the ground that the information sought is irrelevant.

3. To the extent any question in this set of Request seeks information that is protected by the attorney-client privilege and/or the attorney work product doctrine, Plaintiff declines to produce such information, which would include:

a. All confidential communications between Plaintiff, or any of its agents or employees, and its counsel, or any of its counsel’s agents and employees, regarding Plaintiff’s claims and the claims of Plaintiff in this action; and

b. All references to documents prepared for use in this litigation or in anticipation of litigation, including notes, memoranda, pleadings, and correspondence prepared by, at the direction of, or for review by counsel for Plaintiff, regarding Plaintiff’s claims and the claims of Plaintiff in this action.

4. To the extent the information sought by this set of Request is duplicative and/or cumulative of information sought by other written discovery that was propounded by Plaintiff concurrently with this set of Request, Plaintiff declines to respond to those Request seeking such information.

**II. GENERAL OBJECTIONS**

1. Plaintiff objects to these Request for Production in their entirety to the extent they seek information protected from discovery by the attorney-client privilege and/or attorney work-product doctrine.

2. Plaintiff objects to these Request for Production in their entirety to the extent they seek the discovery of information regarding third persons, on the grounds that such information is protected from discovery by federal and state constitutional, statutory, and common laws.

3. Plaintiff objects to these Request for Production in their entirety to the extent they seek information that contains or makes reference to confidential and/or proprietary business information belonging to or concerning Plaintiff and its business.

4. Plaintiff objects to these Request for Production in their entirety to the extent they seek information which is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence, on the ground that they seek evidence outside the permissible scope of discovery.

5. Plaintiff objects to these Request for Production in their entirety to the extent they seek information that is overly broad as to time and subject matter.

6. Plaintiff objects to these Request for Production in their entirety to the extent they seek information that is duplicative and/or cumulative of information sought by other written discovery propounded by Defendant.

7. Plaintiff objects to these Request for Production in their entirety to the extent they prematurely seek to bind Plaintiff to responses and positions it may wish to change if it subsequently discovers new facts. (See *Singer v. Superior Court* (1960)54 Cal.2d 318.)

**III. RESPONSES AND OBJECTIONS TO PRODUCTION REQUEST**

Subject to and without waiving the foregoing objections in any way, all of which are incorporated herein by reference into each of the following individual responses as if fully set forth therein, and to the extent Plaintiff understands each of the individual Request contained in the set, Plaintiff responds and objects as follows:

**REQUEST FOR PRODUCTION NO. 1:**

All DOCUMENTS IDENTIFIED in YOUR responses to PROPOUNDING PARTY’S concurrently served Form Interrogatories, Set One.

**RESPONSE TO REQUEST NO. 1:**

Plaintiff will produce his relevant documents in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 2:**

All policies of insurance, including without limitation, automobile insurance and health insurance, under which YOU might be covered for any claims relating to the INCIDENT.

**RESPONSE TO REQUEST NO. 2:**

Plaintiff will produce his relevant documents in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 3:**

All DOCUMENTS which support YOUR cause of action for negligence against PROPOUNDING PARTY, as alleged in the operative complaint.

**RESPONSE TO REQUEST NO. 3:**

Plaintiff objects to this category of information requested by the propounding party as being vague, ambiguous and seeks attorney work product. Without waiving said objection, Plaintiff responds as follows: Plaintiff will produce his relevant documents in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 4:**

All DOCUMENTS which support YOUR cause of action for premises liability against PROPOUNDING PARTY, as alleged in the operative complaint.

**RESPONSE TO REQUEST NO. 4:**

Plaintiff objects to this category of information requested by the propounding party as being vague, ambiguous and seeks attorney work product. Without waiving said objection, Plaintiff responds as follows: Plaintiff will produce his relevant documents in in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 5:**

All DOCUMENTS which support YOUR claim for damages against PROPOUNDING PARTY.

**RESPONSE TO REQUEST NO. 5:**

Plaintiff objects to this category of information requested by the propounding party as being vague, ambiguous. Without waiving said objection, Plaintiff responds as follows: Plaintiff is in the process of obtaining records and will produce his medical records and photographs in his custody, control or possession that is responsive to this request.

**REQUEST FOR PRODUCTION NO. 6:**

All DOCUMENTS RELATING TO interviews and/or statements of witnesses to the INCIDENT, including all drafts and versions of said interviews or statements.

**RESPONSE TO REQUEST NO. 6:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 7:**

All DOCUMENTS and/or things, including but not limited to photographs and video recordings, RELATED TO the INCIDENT.

**RESPONSE TO REQUEST NO. 7:**

Plaintiff will produce his photographs in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 8:**

All DOCUMENTS and/or things, including but not limited to photographs and video recordings, RELATED TO the injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 8:**

Plaintiff is in the process of obtaining records and will produce his medical records and photographs in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 9:**

All DOCUMENTS REFLECTING any statements made by YOU RELATED TO the INCIDENT and the injuries which YOU claim were caused by the INCIDENT (exclusive of any statements made by YOU to YOUR attorneys).

**RESPONSE TO REQUEST NO. 9:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 10:**

All DOCUMENTS REFLECTING any posts made by YOU on social media sites (i.e., Facebook, Instagram, TikTok, Threads, Snapchat, WhatsApp, YouTube, Twitter, blogs, and websites) REGARDING the INCIDENT and injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 10:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 11:**

All COMMUNICATIONS between YOU and PROPOUNDING PARTY.

**RESPONSE TO REQUEST NO. 11:**

Plaintiff has no documents at this time in his custody, control or possession responsive to this request. Plaintiff has not been contacted by, nor attempted to contact, anyone associated with the premises since the incident.

**REQUEST FOR PRODUCTION NO. 12:**

All COMMUNICATIONS between YOU and any other person (excluding YOUR attorneys, regarding PROPOUNDING PARTY.

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**RESPONSE TO REQUEST NO. 12:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 13:**

All COMMUNICATIONS between YOU and any other person, excluding YOUR attorneys, regarding the INCIDENT.

**RESPONSE TO REQUEST NO. 13:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 14:**

All COMMUNICATIONS between YOU and any other person, excluding YOUR attorneys, regarding the injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 14:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 15:**

All DOCUMENTS RELATED TO any medical treatment that YOU have received for the injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 15:**

Plaintiff is in the process of obtaining records and will provide his medical records in his custody, control, or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 16:**

All DOCUMENTS REFLECTING amounts billed for medical treatment that YOU have received for injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 16:**

Plaintiff is in the process of obtaining records and after conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 17:**

All DOCUMENTS REFLECTING any amounts paid by YOU for medical treatment that YOU have received for injuries which YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 17:**

Plaintiff is in the process of obtaining records and after conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 18:**

All DOCUMENTS, including but not limited to medical records and bills, payments, reports, insurance records, x-rays and imaging records, RELATED TO medical treatment that YOU have received during the past 10 years for injuries to the same parts of YOUR body that YOU claim were injured in the INCIDENT.

**RESPONSE TO REQUEST NO. 18:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 19:**

All DOCUMENTS which support YOUR wage loss claim.

**RESPONSE TO REQUEST NO. 19:**

Plaintiff is not making a claim for loss of wages at this time.

**REQUEST FOR PRODUCTION NO. 20:**

All DOCUMENTS REFLECTING any income earned by YOU during the past five (5) years.

**RESPONSE TO REQUEST NO. 20:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 21:**

All complaints for damages that YOU have filed during the past 10 years.

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**RESPONSE TO REQUEST NO. 21:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 22:**

All DOCUMENTS REFLECTING any workers’ compensation claims made by YOU during the past 10 years.

**RESPONSE TO REQUEST NO. 22:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 23:**

All DOCUMENTS and/or things which support YOUR claim for future medical expenses RELATED to injuries that YOU claim were caused by the INCIDENT.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff is in the process of obtaining records and will provide his medical records in his custody, control or possession that is responsive to this request.

**REQUEST FOR PRODUCTION NO. 24:**

All DOCUMENTS and/or things supporting YOUR claim for lost future earnings, as alleged in the operative complaint.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff is not making a claim for lost future earnings.

**REQUEST FOR PRODUCTION NO. 25:**

All DOCUMENTS and/or things supporting YOUR claim for loss of earning capacity, as alleged in the operative complaint.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff is not making a claim for loss of earning capacity.

**REQUEST FOR PRODUCTION NO. 26:**

All DOCUMENTS which support YOUR alleged general damages, including but not limited to emotional distress, as a result of the INCIDENT.

**RESPONSE TO REQUEST NO. 26:**

Plaintiff will produce his medical records and photographs.

**REQUEST FOR PRODUCTION NO. 27:**

All DOCUMENTS IDENTIFIED in YOUR responses to PROPOUNDING PARTY’S concurrently served Special Interrogatories, Set One.

**RESPONSE TO REQUEST NO. 27:**

Plaintiff will produce his relevant documents in his custody, control or possession that is responsive to this request.

**REQUEST FOR PRODUCTION NO. 28:**

All DOCUMENTS REFLECTING any payments that YOU received from workers compensation or disability insurance during the period of time that YOU claim YOU could not work due to injuries that YOU attribute to the INCIDENT.

**RESPONSE TO REQUEST NO. 28:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 29:**

All reports, including but not limited to incident reports and police reports, made in connection with the INCIDENT.

**RESPONSE TO REQUEST NO. 29:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 30:**

All DOCUMENTS RELATED TO YOUR presence on the SUBJECT PREMISES at any time.

**RESPONSE TO REQUEST NO. 30:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

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**REQUEST FOR PRODUCTION NO. 31:**

All DOCUMENTS REFLECTING that YOU provided PROPOUNDING PARTY with notice of the occurrence of the INCIDENT on the date of the INCIDENT.

**RESPONSE TO REQUEST NO. 31:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 32:**

All DOCUMENTS REFLECTING that YOU provided PROPOUNDING PARTY with notice of the alleged dangerous condition on the SUBJECT PREMISES at any time.

**RESPONSE TO REQUEST NO. 32:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 33:**

All photographs and videos which depict the alleged dangerous condition at the INCIDENT LOCATION at any time.

**RESPONSE TO REQUEST NO. 33:**

Plaintiff will provide photographs in his custody, control or possession that is responsive to this request.

**REQUEST FOR PRODUCTION NO. 34:**

If YOU contend that YOU suffered any emotional injuries as a result of the INCIDENT, then produce every DOCUMENT in support of that contention.

**RESPONSE TO REQUEST NO. 34:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

**REQUEST FOR PRODUCTION NO. 35:**

If YOU contend that YOU suffered any mental injuries as a result of the INCIDENT, then produce every DOCUMENT in support of that contention.

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**RESPONSE TO REQUEST NO. 35:**

After conducting a diligent search and reasonable inquiry, Plaintiff has no documents at this time in his custody, control or possession responsive to this request.

Dated: May 2, 2025 **ADAMSON AHDOOT LLP**



By: \_\_\_\_\_\_\_

Arash Nematollahi, Esq.

Attorneys for Plaintiff

{{ plaintiff }}

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 1150 S. Robertson Blvd., Los Angeles, California 90035.

On May 2, 2025, I served the foregoing document, described as **PLAINTIFF’S RESPONSE TO DEFENDANT’S REQUEST FOR PRODUCTION, SET ONE** on all interested parties in this action by placing a true copy thereof in a sealed envelope, addressed as follows:

{{ defendant\_counsel\_info }}

Attorneys for Defendant

**{{ defendant }}**

**(BY OVERNIGHT DELIVERY)** I caused a true copy thereof to be enclosed in a sealed envelope with delivery fees provided for, and to be deposited in the box regularly maintained by Federal Express in Los Angeles, CA.

**(BY ELECTRONIC MAIL)** By electronically serving the document(s) to the electronic mail address set forth above on this date by or before 11:59 p.m., pursuant to California Rules of Court, Rule 2.251, and consistent with Code of Civil Procedure § 1010.6(a)(2), (4) and (5).

**(BY FACSIMILE)** I sent such document via facsimile mail to the number(s) noted above. The transmission was reported as complete and without error, and the transmitting facsimile machine properly issued the transmission report.

**(BY MAIL)** As follows: I placed such envelope, with postage thereon prepaid, in the United States mail at Los Angeles, California.

I am “readily familiar” with the firm’s practice of collecting and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid, at Los Angeles, California, in the ordinary course of business. I am aware that, on motion of the party served, service is presumed invalid if the postal cancellation or postage meter date is more than one day after the date of deposit for mailing in this affidavit.

**(STATE)** I declare, under penalty of perjury under the laws of the State of California, that the above is true and correct.

Executed on April 1, 2024, at Los Angeles, California.



Maria Gonzalez