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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN DIEGO**

**UNLIMITED JURISDICTION**

|  |  |  |
| --- | --- | --- |
| {{ plaintiff }}, an individual,  Plaintiff,  vs.  {{ defendant }}, and DOES 1–100, inclusive,  Defendants. |  | Case No.: {{ case\_number }}  Assigned for all Purposes to {{ judge}}  {{ department }}  **PLAINTIFF’S RESPONSES TO DEFENDANT MARCOS FRANCISCO RAMIREZ AVILA.’S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**  Complaint Filed: **{{ filing\_date }}**  Trial Date: **{{ trial\_date }}** |
|  |  |  |

PROPOUNDING PARTY: DEFENDANT, {{ defendant }}

RESPONDING PARTY: PLAINTIFF, {{ plaintiff }}

SET NO.: ONE

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

Plaintiff {{ plaintiff }} hereby responds and objects to Defendants’ Request for Production of Documents, Set One, 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 OF DOCUMENTS, SET ONE**

{{ responses }}

Dated: May 13, 2025 Respectfully submitted,

**ADAMSON AHDOOT LLP**



By:

{{ acting\_attorney }} Attorneys for Plaintiff

{{ plaintiff }}, an individual

**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 1122 S. La Cienega Blvd., Los Angeles, CA 90035.

On May 13, 2025, I served the document(s) described as: **{{ plaintiff }}’S RESPONSES TO DEFENDANT {{ defendant }}’S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE,** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

{{ defendant\_counsel\_attorneys }}

{{ defendant\_counsel\_firm }}

{{ defendant\_counsel\_adress }}

{{ defendant\_counsel\_contact }}

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.

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AI-generated content may be incorrect.

Executed on May 13, 2025, at Los Angeles, California.

{{ acting\_clerk }}