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**Attorney for Plaintiffs:**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF**

|  |  |  |
| --- | --- | --- |
| **CLARK KENT, INDIVIDUAL**  Plaintiff,  **vs.**  **FIRST LAST, MANAGER and DOES 1 to 25, inclusive**  Defendants | **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)** | **Case No.:**  **PLAINTIFF CLARK KENT‘S REQUEST FOR PRODUCTION OF DOCUMENTS AND/OR THINGS FOR INSPECTION TO DEFENDANT FIRST LAST, SET No. (2) Two** |

**Propounding Party: Plaintiff, Clark Kent**

**Responding Party: Defendant, First last**

**Set No.: Two (2)**

TO DEFENDANT, FIRST LAST, AND HIS ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff Clark Kent requests that Defendant, First last, respond to the following Request for Production of Documents Set No. (1) One separately and fully in writing and under oath, pursuant to Sections *§2030.010 et seq. of the California Civil Code of Procedure*, and that the responses be signed and verified.

Responses to requests are to be signed and served upon Plaintiff, Clark Kent, within **30 days** **(35 days if interrogatories were sent mail within California)** from date of service.

**INSTRUCTIONS**

In answering these requests for production, furnish all information that is available to YOU. If YOU cannot answer an interrogatory completely, answer it to the extent possible. If a request for production may be answered by reference to a particular document, the document may be attached as an exhibit to a response. If the document has more than one page, please refer to the page and section where the answer to the request for production may be located.

If YOU do not have personal knowledge sufficient to respond fully to a request for production, so state, but make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, unless the information is equally available to the propounding party.

**DEFINITIONS**

1. As used herein, the term **“PERSON(S)”** refers to any natural person, firm, agency, organization, association, partnership, joint venture, corporation, public entity or any other kind of business, legal or government entity association.
2. As used herein, the term **“YOU”, “YOUR,” “LANDLORD,” ”YOURSELF,” “INDIVIDUAL(S),” and “DEFENDANT”** unless otherwise stated, refers to DEFENDANT, , and includes any and all of its agents, representatives, employees, servants, consultants, supervisors, contractors, subcontractors, investigators, attorneys, and any other persons or entities acting on purporting to act on behalf of Defendant, First last.
3. As used herein, the term **“PLAINTIFF,” and “TENANT”** unless otherwise stated, refers to any natural person, agents, employees, contractors, and any other persons or entities acting on purporting to act on behalf of Plaintiff .
4. **“PERTAINING”** and **“RELATING”**, used herein after in this request, means evidencing, memorializing, referring, constituting, containing, discussing, describing, embodying, reflecting, identifying, mentioning, stating, or otherwise, relating, to in any way, in whole or in part, the subject matter referred to in this request including but not limited to dates and times.
5. As used herein, the term **“GOVERNMENT AGENCY”** includes .
6. As used herein, the term **“IDENTIFY”** or **“IDENTIFIED”** as used with respect to the identification of a **PERSON** calls for the following information; the full name of the **PERSON** the, home address of the **PERSON** and the telephone number of the **PERSON**. Additionally, **PERSON’S EMPLOYER**; if the **PERSON** is other than a natural PERSON, the name of and a description of the nature of the entity; the **PERSON’S** last known business address and telephone number. The **PERSON’S** last known home address and telephone number, and the **PERSON’S** last known email address.
7. As used herein, the term **“IDENTIFY** ” or **“IDENTIFIED”** as used with respect to a document or other item of physical evidence or calls for the following information: A description of the document or item of physical evidence with sufficient specificity, including date(s) to enable the propounder of these interrogatories to **IDENTIFY**  such document or item of physical evidence, either electronic or written, in a motion to produce or in a subpoena duces tecum; and
8. The name and last known address, e-mail address, and telephone number of each **PERSON** who presently has custody of the documents or item of physical evidence, or if that is not known, the name and last known address of the PERSON who YOU know or believe to last possess the document or item of physical evidence.
9. In lieu of **“IDENTIFYING”** any document(s), **YOU** may attach a copy of it to **YOUR** answer, indicating the question to which it is responsive.
10. As used herein, the term **“COMPLAINT”** shall refer to **PLAINTIFFS** complaint filed on or about \_\_\_\_\_\_\_\_\_\_\_\_, in the above-caption action.
11. As used herein, the term **“COMMUNICATION(S)”** refers to any act, action, oral, speech, written correspondence, electronic, electronic data, electronic correspondence (e-mail), contact, expression of words, thoughts, ideas, transmission or exchange of data or other information to another **PERSON**, whether orally, **PERSON-to-PERSON**, in a group, by telephone, letter, personal delivery, telex, email, facsimile, text message, instant message, recorded message, or any other method of communication whether electronic or written. All such **COMMUNICATION(S)** in **WRITING** shall include, without limitation, printed, typewritten, handwritten, electronic or other documents.
12. As used herein, the term **“WRITING”** is used in the broadcast sense as defined by California Evidence Code Section§ 250, including but not limited to photographs, emails, all stored compilations of information of any kind that may be retrievable (such as, but without limitation, the content of computer memory,) and copies of documents that are not identical to the originals whether or not the originals are in **YOUR** possession, custody, or control.
13. All designated **WRITING(S)** and/or **DOCUMENT(S)** are to be taken as including all attachments and enclosures.
14. Any reference in the singular shall include the plural and vice versa in order to bring within the scope of the request of all documents, which might otherwise be construed, to be outside its scope.
15. In the event that **YOU** claim attorney-client privilege and/or work product privilege with respect to any documents, please state with respect to any such document the following:
16. The identity of the **PERSON(S)** to whom it was addressed, delivered or otherwise transmitted
17. The nature of the document;
18. The date the document was executed, if different from the date it bears; and
19. The identity and most recent known address of the **PERSON** or entity that has custody or control of such document.
20. As used herein, the term **“PROPERTY” or “UNIT”** refers to real property and residential dwelling located 1331 Yorkshire Place NW Unit 1, Los Angeles, North Carolina, 28027.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 120**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for pigeons in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 121**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and pigeons) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 122**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and pigeons) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 123**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any pigeons at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 124**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for bats in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 125**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and bats) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 126**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and bats) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 127**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any bats at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 128**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for opossums in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 129**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and opossums) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 130**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and opossums) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 131**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any opossums at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 132**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for bees in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 133**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and bees) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 134**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and bees) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 135**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any bees at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 136**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for wasps in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 137**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and wasps) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 138**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and wasps) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 139**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any wasps at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 140**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for hornets in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 141**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and hornets) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 142**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and hornets) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 143**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any hornets at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 144**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for mosquitos in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 145**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including physical defects and mosquitos) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 146**

Any and all DOCUMENTS which reference or describe any defects (including physical defects and mosquitos) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 147**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate any mosquitos at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 148**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the electrical panel in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 149**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the electrical panel) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 150**

Any and all DOCUMENTS which reference or describe any defects (including the electrical panel) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 151**

Any and all DOCUMENTS which evidence YOUR efforts to repair the electrical panel at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 152**

Any and all DOCUMENTS which evidence YOUR efforts to replace the electrical panel at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 153**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the wall switches in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 154**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the wall switches) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 155**

Any and all DOCUMENTS which reference or describe any defects (including the wall switches) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 156**

Any and all DOCUMENTS which evidence YOUR efforts to repair the wall switches at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 157**

Any and all DOCUMENTS which evidence YOUR efforts to replace the wall switches at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 158**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the exterior lighting in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 159**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the exterior lighting) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 160**

Any and all DOCUMENTS which reference or describe any defects (including the exterior lighting) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 161**

Any and all DOCUMENTS which evidence YOUR efforts to repair the exterior lighting at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 162**

Any and all DOCUMENTS which evidence YOUR efforts to replace the exterior lighting at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 163**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the light fixtures in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 164**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the light fixtures) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 165**

Any and all DOCUMENTS which reference or describe any defects (including the light fixtures) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 166**

Any and all DOCUMENTS which evidence YOUR efforts to repair the light fixtures at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 167**

Any and all DOCUMENTS which evidence YOUR efforts to replace the light fixtures at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 168**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the fan(s) in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 169**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the fan(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 170**

Any and all DOCUMENTS which reference or describe any defects (including the fan(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 171**

Any and all DOCUMENTS which evidence YOUR efforts to repair the fan(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 172**

Any and all DOCUMENTS which evidence YOUR efforts to replace the fan(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 173**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the smoke alarm(s) in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 174**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the smoke alarm(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 175**

Any and all DOCUMENTS which reference or describe any defects (including the smoke alarms(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 176**

Any and all DOCUMENTS which evidence YOUR efforts to repair the smoke alarm(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 177**

Any and all DOCUMENTS which evidence YOUR efforts to replace the smoke alarm(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 178**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the fire extinguisher(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 179**

Any and all DOCUMENTS which reference or describe any defects (including the fire extinguisher(s)) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 180**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the fire extinguisher(s) in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 181**

Any and all DOCUMENTS which evidence YOUR efforts to replace the fire extinguisher(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 182**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the nongfi electrical outlets by water in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 183**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the nongfi electrical outlets by water) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 184**

Any and all DOCUMENTS which reference or describe any defects (including the nongfi electrical outlets by water) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 185**

Any and all DOCUMENTS which evidence YOUR efforts to replace the nongfi electrical outlets by water at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 186**

Any and all DOCUMENTS relating to the PROPERTY originating from the Department of Environmental Health from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to citations, notices of inspection, notices and orders to comply, notices of violations, twoday work orders, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 187**

Any and all DOCUMENTS relating to the PROPERTY originating from the Department of Public Health from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to citations, notices of inspection, notices and orders to comply, notices of violations, twoday work orders, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 188**

Any and all DOCUMENTS relating to the PROPERTY originating from the Department of Public Health from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to citations, notices of inspection, notices and orders to comply, notices of violations, twoday work orders, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 189**

Any and all DOCUMENTS relating to the PROPERTY originating from the fire department from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to fire reports, notices of inspection, notices and orders to comply, notices of violations, citations, orders, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 190**

Any and all DOCUMENTS relating to the PROPERTY originating from the police department from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to fire reports, notices of inspection, notices and orders to comply, notices of violations, citations, orders, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 191**

Any and all DOCUMENTS relating to the PROPERTY originating from Code Enforcement from the city or county that the PROPERTY is located in during that time that YOU owned the PROPERTY, including but not limited to fire reports, notices of inspection, notices and orders to comply, notices of violations, citations, work orders and notices of enforcement.

**REQUEST FOR PRODUCTION NO. 192**

Any and all DOCUMENTS relating to Plaintiff’s complaints about the toilet(s) in PLAINTIFF(S) UNIT  at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 193**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding issues with the toilet(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 194**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to issues with the toilet(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 195**

Any and all DOCUMENTS which reference or describe issues with the toilet(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 196**

Any and all DOCUMENTS which evidence YOUR efforts to repair replace the toilet(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 197**

Any and all DOCUMENTS relating to Plaintiff’s complaints about the shower(s) in PLAINTIFF(S) UNIT  at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 198**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding issues with the shower(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 199**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to issues with the shower(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 200**

Any and all DOCUMENTS which reference or describe issues with the shower(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 201**

Any and all DOCUMENTS which evidence YOUR efforts to repair the shower(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 202**

Any and all DOCUMENTS relating to Plaintiff’s complaints about the bath(s) in PLAINTIFF(S) UNIT  at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 203**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding issues with the bath(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 204**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to issues with the bath(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 205**

Any and all DOCUMENTS which reference or describe issues with the bath(s) in PLAINTIFF(S) UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 206**

Any and all DOCUMENTS which evidence YOUR efforts to repair replace the bath(s) in PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 207**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the plumbing fixtures in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 208**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any defects (including the plumbing fixtures) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 209**

Any and all DOCUMENTS which reference or describe any defects (including the plumbing fixtures) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 210**

Any and all DOCUMENTS which evidence YOUR efforts to repair the plumbing fixtures at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 211**

Any and all DOCUMENTS which evidence YOUR efforts to replace the plumbing fixtures at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 212**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with insufficient water pressure in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 213**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any insufficient water pressure at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 214**

Any and all DOCUMENTS which reference or describe any insufficient water pressure at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 215**

Any and all DOCUMENTS which evidence YOUR efforts to repair any insufficient water pressure at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 216**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with drainage clogs in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 217**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any drainage clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 218**

Any and all DOCUMENTS which reference or describe any drainage clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 219**

Any and all DOCUMENTS which evidence YOUR efforts to repair any drainage clogs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 220**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with toilet clogs in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 221**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any toilet clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 222**

Any and all DOCUMENTS which reference or describe any toilet clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 223**

Any and all DOCUMENTS which evidence YOUR efforts to repair any toilet clogs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 224**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with bath clogs in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 225**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any bath clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 226**

Any and all DOCUMENTS which reference or describe any bath clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 227**

Any and all DOCUMENTS which evidence YOUR efforts to repair any bath clogs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 228**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with sink clogs in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 229**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any sink clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 230**

Any and all DOCUMENTS which reference or describe any sink clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 231**

Any and all DOCUMENTS which evidence YOUR efforts to repair any sink clogs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 232**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with shower clogs in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 233**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to any shower clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 234**

Any and all DOCUMENTS which reference or describe any shower clogs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 235**

Any and all DOCUMENTS which evidence YOUR efforts to repair any shower clogs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 236**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with bumps in the ceiling in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 237**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to bumps in the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 238**

Any and all DOCUMENTS which reference or describe bumps in the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 239**

Any and all DOCUMENTS which evidence YOUR efforts to repair any bumps in the ceiling at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 240**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with holes in the ceiling in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 241**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to holes in the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 242**

Any and all DOCUMENTS which reference or describe holes in the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 243**

Any and all DOCUMENTS which evidence YOUR efforts to repair any holes in the ceiling at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 244**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with water stains on the ceiling in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 245**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to water stains on the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 246**

Any and all DOCUMENTS which reference or describe water stains on the ceiling at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 247**

Any and all DOCUMENTS which evidence YOUR efforts to repair any water stains on the ceiling at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 248**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with water stains on the wall in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 249**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to water stains on the wall at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 250**

Any and all DOCUMENTS which reference or describe water stains on the wall at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 251**

Any and all DOCUMENTS which evidence YOUR efforts to repair any water stains on the wall at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 252**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with holes in the wall in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 253**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to holes in the wall at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 254**

Any and all DOCUMENTS which reference or describe holes in the wall at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 255**

Any and all DOCUMENTS which evidence YOUR efforts to repair any holes in the wall at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 256**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the paint in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 257**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the paint at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 258**

Any and all DOCUMENTS which reference or describe the paint at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 259**

Any and all DOCUMENTS which evidence YOUR efforts to repair the paint at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 260**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the exterior deck porch in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 261**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the exterior deck porch at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 262**

Any and all DOCUMENTS which reference or describe the exterior deck porch at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 263**

Any and all DOCUMENTS which evidence YOUR efforts to repair the exterior deck porch at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 264**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the toilets' waterproofing in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 265**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the toilets' waterproofing at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 266**

Any and all DOCUMENTS which reference or describe the toilets' waterproofing at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 267**

Any and all DOCUMENTS which evidence YOUR efforts to repair the toilets' waterproofing at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 268**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the tub's' waterproofing in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 269**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the tub's' waterproofing at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 270**

Any and all DOCUMENTS which reference or describe the tub's' waterproofing at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 271**

Any and all DOCUMENTS which evidence YOUR efforts to repair the tub's' waterproofing at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 272**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the staircase at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 273**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the staircase at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 274**

Any and all DOCUMENTS which reference or describe the staircase at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 275**

Any and all DOCUMENTS which evidence YOUR efforts to repair the staircase at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 276**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with flooding in the basement at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 277**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to flooding in the basement at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 278**

Any and all DOCUMENTS which reference or describe flooding in the basement at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 279**

Any and all DOCUMENTS which evidence YOUR efforts to repair the flooding in the basement at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 280**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY for issues with the leaks in garage in the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 281**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to the leaks in garage at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 282**

Any and all DOCUMENTS which reference or describe the leaks in garage at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 283**

Any and all DOCUMENTS which evidence YOUR efforts to repair any leaks in garage at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 284**

Any and all DOCUMENTS relating to Plaintiff’s complaints about leak(s) in the garage at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 285**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding leak(s) in the garage at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 286**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to leak(s) in the garageat the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 287**

Any and all DOCUMENTS which reference or describe leak(s) in the garage at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 288**

Any and all DOCUMENTS which evidence YOUR efforts to repair the leak(s) in the garage at the SUBJECT PROPERTY during the past seven (7) years.

Executed this\_\_\_\_\_\_\_\_\_\_\_\_\_

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Kevin Lipton, Esq.

**Attorney for Plaintiff:**