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**Attorney for Plaintiffs:**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF**

|  |  |  |
| --- | --- | --- |
| **CLARK KENT, INDIVIDUAL; LOIS LANE, GUARDIAN; BRUCE WAYNE, INDIVIDUAL**  Plaintiff,  **vs.**  **TONY STARK, MANAGER; STEVE ROGERS, OWNER 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 STEVE ROGERS, SET No. (1) One** |

**Propounding Party: Plaintiff, Clark Kent**

**Responding Party: Defendant, Steve Rogers**

**Set No.: One (1)**

TO DEFENDANT, STEVE ROGERS, AND HIS ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff Clark Kent requests that Defendant, Steve Rogers, 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, Steve Rogers.
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. 1**

True and correct copies of any and all grant deeds identifying the owner(s) of the PROPERTY, including but not limited to, YOUR ownership and or prior owners of the PROPERTY.

**REQUEST FOR PRODUCTION NO. 2**

Any and all FINANCIAL STATEMENTS pertaining to the PROPERTY since YOU or any entity YOU own or control purchased the PROPERTY.

**REQUEST FOR PRODUCTION NO. 3**

Any and all VIOLATION NOTICES pertaining to the PROPERTY since YOU or any entity YOU own or control purchased the PROPERTY.

**REQUEST FOR PRODUCTION NO. 4**

Any and all DOCUMENTS RELATING TO YOUR employment of any and all personnel involved with YOUR PROPERTY in any way during that time that YOU owned the PROPERTY, including but not limited to brokers, real estate agents, caretakers, managers, PROPERTY managers, contractors, construction workers, plumbers, electricians, maintenance workers, security guards, and receptionists.

**REQUEST FOR PRODUCTION NO. 5**

Any and all DOCUMENTS sent and received between YOU and any employee regarding the management of PROPERTY during that time that YOU owned the PROPERTY.

**REQUEST FOR PRODUCTION NO. 6**

Any and all insurance policies, including homeowner’s insurance, which may provide coverage for this action.

**REQUEST FOR PRODUCTION NO. 7**

Any and all DOCUMENTS which evidence a license to rent PROPERTY in the County of Los Angeles.

**REQUEST FOR PRODUCTION NO. 8**

Any and all Declaration pages relative to insurance policies that may provide coverage for the PLAINTIFFS’ PROPERTY and or UNIT.

**REQUEST FOR PRODUCTION NO. 9**

Any and all DOCUMENTS during that time that YOU owned and or managed the PROPERTY relating to repair and maintenance work at the PROPERTY, including but not limited to receipts, invoices and work orders.

**REQUEST FOR PRODUCTION NO. 10**

Any and all DOCUMENTS which PLAINTIFFS sent YOU during the TENANCY.

**REQUEST FOR PRODUCTION NO. 11**

Any and all DOCUMENTS during the TENANCY informing PLAINTIFFS that YOU would be entering the PROPERTY for any reason.

**REQUEST FOR PRODUCTION NO. 12**

Any and all PLAINTIFF(S) guidelines, regulations, policies, procedures or rules RELATED TO the PROPERTY during the TENANCY.

**REQUEST FOR PRODUCTION NO. 13**

Each and every notice and written COMMUNICATION between PLAINTIFFS and YOU, including YOUR partners, officers, directors, agents, contractors, PROPERTY managers, employees and or any of their successors, assignees, and or predecessors in interest during the TENANCY.

**REQUEST FOR PRODUCTION NO. 14**

Any and all COMMUNICATIONS between PLAINTIFFS and YOU, including but not limited to complaints about conditions, work orders, requests for repairs, notices from utility companies, and notice of repairs during the time that YOU owned or managed the PROPERTY.

**REQUEST FOR PRODUCTION NO. 15**

Any and all NOTICES served by YOU on PLAINTIFFS (including, but not limited to, Notices to Pay Rent or Quit, Notices to Quit, Notices to Perform Covenants, Notices of entry, Notices of violation of rental agreement, and Notices purporting to terminate PLAINTIFFS’ TENANCY or change any terms thereof), during the time that YOU owned or managefd the PROPERTY.

**REQUEST FOR PRODUCTION NO. 16**

Any and all DOCUMENTS which PLAINTIFFS sent you during the TENANCY in regard to repair requests.

**REQUEST FOR PRODUCTION NO. 17**

Any DOCUMENTS which YOU have received from PLAINTIFFS, including copies of checks or money orders, during the TENANCY.

**REQUEST FOR PRODUCTION NO. 18**

Any and all records of payments for any reason (including, but not limited to, rent, security deposits, late fees, or NSF fees) from the PLAINTIFFS to YOU.  Such records include, but are not limited to, receipts, rent rolls, and ledgers.

**REQUEST FOR PRODUCTION NO. 19**

Any and all DOCUMENTS contained in a PLAINTIFF(S) file for PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 20**

Any and all DOCUMENTS which terminated PLAINTIFFS’ tenancy at the PROPERTY.

**REQUEST FOR PRODUCTION NO. 21**

Any and all DOCUMENTS which evidence any past inspection(s) of the PROPERTY by YOU.

**REQUEST FOR PRODUCTION NO. 22**

Any and all DOCUMENTS evidencing any PROPERTY management agreement regarding the PROPERTY during that time that YOU owned the PROPERTY.

**REQUEST FOR PRODUCTION NO. 23**

Any and all DOCUMENTS YOU IDENTIFIED in YOUR responses to Plaintiffs’ Form Interrogatories—General, Set One.

**REQUEST FOR PRODUCTION NO. 24**

Any and all DOCUMENTS YOU IDENTIFIED in YOUR responses to Plaintiffs’ Special Interrogatories, Set One.

**REQUEST FOR PRODUCTION NO. 25**

Any and all insurance policies that may cover the claims of any PLAINTIFF.

**REQUEST FOR PRODUCTION NO. 26**

Any log or other DOCUMENTS whereby YOU organize and track REPAIR REQUESTS made by any PLAINTIFF(S) of the PROPERTY.

**REQUEST FOR PRODUCTION NO. 27**

Any and all management agreements between YOU and any individual conducting repairs at the PROPERTY.

**REQUEST FOR PRODUCTION NO. 28**

Any and all DOCUMENTS which reflect communication between YOU and any third party (including contractor, subcontractor, agent or employee) regarding the physical condition of the PROPERTY and or the SUBJECT PROPERTY in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 29**

Any and all RENT ROLLS pertaining to the PROPERTY for the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 30**

Any and all DOCUMENTS (including written reports and REPAIR REQUESTS) which reference the physical condition of the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 31**

Any and all DOCUMENTS which describe the terms of PLAINTIFFS' tenancy at the SUBJECT PROPERTY.

**REQUEST FOR PRODUCTION NO. 32**

Any and all rental agreements, including but not limited to, contracts and leases, which pertain to PLAINTIFFS' occupancy of the SUBJECT PROPERTY.

**REQUEST FOR PRODUCTION NO. 33**

Any and all PLAINTIFF(S) guidelines, regulations, policies, procedures or rules provided to PLAINTIFFS by DEFENDANTS.

**REQUEST FOR PRODUCTION NO. 34**

Any and all DOCUMENTS (including operation manuals) which describe how any PROPERTY owned or managed by YOU is to be managed.

**REQUEST FOR PRODUCTION NO. 35**

Any and all DOCUMENTS (including operation manuals) which describe how REPAIR REQUESTS are to be responded to by YOU.

**REQUEST FOR PRODUCTION NO. 36**

Any and all DOCUMENTS (including supervisor log books, handbooks, or other manuals) which provide instructions or guidance to YOUR employees or vendors regarding the repair and or maintenance of the PROPERTY.

**REQUEST FOR PRODUCTION NO. 37**

Any and all DOCUMENTS (including supervisor log books, handbooks, or other manuals) which provide instructions or guidance to YOUR employees or vendors regarding the operation management of the PROPERTY.

**REQUEST FOR PRODUCTION NO. 38**

Any and all DOCUMENTS which pertain to the repair of the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 39**

Any and all invoices or other DOCUMENTS which reference repairs to the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 40**

Any and all DOCUMENTS which reflect communications between the employees or agents of DEFENDANTS regarding the physical condition of the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 41**

Any and all DOCUMENTS which reflect communications between DEFENDANTS regarding the physical condition of the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 42**

Any and all PHOTOGRAPHS of the interior of the PLAINTIFFS’ UNIT and or PROPERTY.

**REQUEST FOR PRODUCTION NO. 43**

Any and all PHOTOGRAPHS of the exterior of the PROPERTY.

**REQUEST FOR PRODUCTION NO. 44**

Any and all DOCUMENTS which evidence any past inspection of the SUBJECT PROPERTY and   or PLAINTIFFS’ UNITS by DEFENDANTS.

**REQUEST FOR PRODUCTION NO. 45**

Any and all DOCUMENTS which evidence any past inspection of the SUBJECT PROPERTY by any third party in the last SEVEN years.

**REQUEST FOR PRODUCTION NO. 46**

Any and all DOCUMENTS which reflect communications between any of PLAINTIFFS and DEFENDANT within the last SEVEN years.

**REQUEST FOR PRODUCTION NO. 47**

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

**REQUEST FOR PRODUCTION NO. 48**

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

**REQUEST FOR PRODUCTION NO. 49**

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

**REQUEST FOR PRODUCTION NO. 50**

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

**REQUEST FOR PRODUCTION NO. 51**

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

**REQUEST FOR PRODUCTION NO. 52**

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

**REQUEST FOR PRODUCTION NO. 53**

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

**REQUEST FOR PRODUCTION NO. 54**

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

**REQUEST FOR PRODUCTION NO. 55**

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

**REQUEST FOR PRODUCTION NO. 56**

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

**REQUEST FOR PRODUCTION NO. 57**

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

**REQUEST FOR PRODUCTION NO. 58**

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

**REQUEST FOR PRODUCTION NO. 59**

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

**REQUEST FOR PRODUCTION NO. 60**

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

**REQUEST FOR PRODUCTION NO. 61**

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

**REQUEST FOR PRODUCTION NO. 62**

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

**REQUEST FOR PRODUCTION NO. 63**

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

**REQUEST FOR PRODUCTION NO. 64**

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

**REQUEST FOR PRODUCTION NO. 65**

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

**REQUEST FOR PRODUCTION NO. 66**

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

**REQUEST FOR PRODUCTION NO. 67**

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

**REQUEST FOR PRODUCTION NO. 68**

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

**REQUEST FOR PRODUCTION NO. 69**

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

**REQUEST FOR PRODUCTION NO. 70**

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

**REQUEST FOR PRODUCTION NO. 71**

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

**REQUEST FOR PRODUCTION NO. 72**

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

**REQUEST FOR PRODUCTION NO. 73**

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

**REQUEST FOR PRODUCTION NO. 74**

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

**REQUEST FOR PRODUCTION NO. 75**

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

**REQUEST FOR PRODUCTION NO. 76**

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

**REQUEST FOR PRODUCTION NO. 77**

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

**REQUEST FOR PRODUCTION NO. 78**

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

**REQUEST FOR PRODUCTION NO. 79**

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

**REQUEST FOR PRODUCTION NO. 80**

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

**REQUEST FOR PRODUCTION NO. 81**

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

**REQUEST FOR PRODUCTION NO. 82**

Any and all DOCUMENTS relating to Plaintiff’s complaints about broken door(s) at the building at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 83**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding broken door(s) at the building at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 84**

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

**REQUEST FOR PRODUCTION NO. 85**

Any and all DOCUMENTS which reference or describe broken door(s) at the building at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 86**

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

**REQUEST FOR PRODUCTION NO. 87**

Any and all DOCUMENTS relating to YOUR procedure for collecting and documenting security deposits from tenants at the commencement of a lease.

**REQUEST FOR PRODUCTION NO. 88**

Any and all DOCUMENTS relating to YOUR standard procedure for conducting initial walkthroughs with tenants upon movein, including how damages or conditions are noted.

**REQUEST FOR PRODUCTION NO. 89**

Any and all DOCUMENTS relating to YOUR policy for scheduling final walkthroughs with tenants upon moveout.

**REQUEST FOR PRODUCTION NO. 90**

Any and all DOCUMENTS YOU use or require for recording the condition of the PROPERTY during a final walkthrough.

**REQUEST FOR PRODUCTION NO. 91**

Any and all DOCUMENTS relating to YOUR procedure for notifying tenants about the scheduling of a final walkthrough, including notice templates, emails, or letters.

**REQUEST FOR PRODUCTION NO. 92**

Any and all DOCUMENTS describing circumstances under which YOU would proceed with deductions from a security deposit without conducting a final walkthrough.

**REQUEST FOR PRODUCTION NO. 93**

Any and all DOCUMENTS identifying instances in which YOU returned a security deposit more than 21 days after the tenant vacated the PROPERTY, including the tenant’s name, address, and dates.

**REQUEST FOR PRODUCTION NO. 94**

Any and all DOCUMENTS reflecting the reasons for any security deposit returned more than 21 days after a tenant vacated.

**REQUEST FOR PRODUCTION NO. 95**

Any and all DOCUMENTS identifying instances in which YOU did not return a security deposit more than 21 days after the tenant vacated the PROPERTY, including the tenant’s name, address, and dates.

**REQUEST FOR PRODUCTION NO. 96**

Any and all DOCUMENTS reflecting the reasons for any security deposit was not returned more than 21 days after a tenant vacated.

**REQUEST FOR PRODUCTION NO. 97**

Any and all complaints, grievances, or correspondence from tenants regarding the handling or return of security deposits in the past ten (10) years.

**REQUEST FOR PRODUCTION NO. 98**

Any and all DOCUMENTS reflecting the resolution of each complaint identified in the previous request for production.

**REQUEST FOR PRODUCTION NO. 99**

Any and all DOCUMENTS describing YOUR standard timeline for returning security deposits to tenants after they vacate.

**REQUEST FOR PRODUCTION NO. 100**

Any and all DOCUMENTS describing YOUR procedure if a tenant disputes deductions from their security deposit.

**REQUEST FOR PRODUCTION NO. 101**

Any and all DOCUMENTS relating to YOUR policy for conducting security deposit returns when a final walkthrough is not performed.

**REQUEST FOR PRODUCTION NO. 102**

Any and all DOCUMENTS describing reasons why YOU might not conduct a final walkthrough with a tenant.

**REQUEST FOR PRODUCTION NO. 103**

Any and all DOCUMENTS identifying each instance where YOU returned a security deposit in full or in part without conducting a final walkthrough, including tenant name(s) and dates.

**REQUEST FOR PRODUCTION NO. 104**

Any and all DOCUMENTS explaining why a walkthrough was not conducted in the instances identified in the previous request for production.

**REQUEST FOR PRODUCTION NO. 105**

Any and all DOCUMENTS relating to YOUR accounting procedure for tracking security deposits, including how funds are held, interest (if any), and reconciliation upon return.

**REQUEST FOR PRODUCTION NO. 106**

Any and all training materials, manuals, or guidelines provided to YOUR staff or agents regarding the handling of security deposits, walkthroughs, and compliance with the 21day return requirement.

**REQUEST FOR PRODUCTION NO. 107**

Any and all DOCUMENTS supporting YOUR compliance with legal requirements to return or itemize security deposits within 21 days of a tenant vacating.

**REQUEST FOR PRODUCTION NO. 108**

Any and all DOCUMENTS describing changes to YOUR procedures for security deposits, walkthroughs, or returns over the past ten (10) years, including the reasons for such changes.

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

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Kevin Lipton, Esq.

**Attorney for Plaintiff:**