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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 TONY STARK, SET No. (3) Three** |

**Propounding Party: Plaintiff, Clark Kent**

**Responding Party: Defendant, Tony Stark**

**Set No.: Three (3)**

TO DEFENDANT, TONY STARK, AND HIS ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff Clark Kent requests that Defendant, Tony Stark, 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, Tony Stark.
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. 240**

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

**REQUEST FOR PRODUCTION NO. 242**

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

**REQUEST FOR PRODUCTION NO. 244**

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

**REQUEST FOR PRODUCTION NO. 245**

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

**REQUEST FOR PRODUCTION NO. 246**

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

**REQUEST FOR PRODUCTION NO. 247**

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

**REQUEST FOR PRODUCTION NO. 248**

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

**REQUEST FOR PRODUCTION NO. 249**

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

**REQUEST FOR PRODUCTION NO. 250**

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

**REQUEST FOR PRODUCTION NO. 251**

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

**REQUEST FOR PRODUCTION NO. 252**

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

**REQUEST FOR PRODUCTION NO. 253**

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

**REQUEST FOR PRODUCTION NO. 254**

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

**REQUEST FOR PRODUCTION NO. 255**

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

**REQUEST FOR PRODUCTION NO. 256**

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

**REQUEST FOR PRODUCTION NO. 257**

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

**REQUEST FOR PRODUCTION NO. 258**

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

**REQUEST FOR PRODUCTION NO. 259**

Any and all DOCUMENTS which evidence YOUR efforts to replace any ineffective waterproofing of door(s) 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 water intrusion insects that came through the door(s) 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 water intrusion insects that came through the door(s) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 262**

Any and all DOCUMENTS which reference or describe the water intrusion insects that came through the door(s) at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 263**

Any and all DOCUMENTS which evidence YOUR efforts to repair any water intrusion insects that came through the door(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 264**

Any and all DOCUMENTS which evidence YOUR efforts to replace any water intrusion insects that came through the door(s) at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 265**

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. 266**

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. 267**

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. 268**

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. 269**

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. 270**

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. 271**

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. 272**

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. 273**

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. 274**

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. 275**

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. 276**

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. 277**

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. 278**

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. 279**

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. 280**

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. 281**

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. 282**

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. 283**

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. 284**

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. 285**

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. 286**

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. 287**

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

**REQUEST FOR PRODUCTION NO. 289**

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. 290**

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. 291**

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. 292**

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. 293**

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. 294**

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. 295**

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

**REQUEST FOR PRODUCTION NO. 296**

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. 297**

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. 298**

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. 299**

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. 300**

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. 301**

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. 302**

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. 303**

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

**REQUEST FOR PRODUCTION NO. 304**

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. 305**

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. 306**

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. 307**

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. 308**

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. 309**

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. 310**

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. 311**

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. 312**

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. 313**

Any and all DOCUMENTS relating to Plaintiff’s complaints about a broken mailbox at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 314**

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

**REQUEST FOR PRODUCTION NO. 315**

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

**REQUEST FOR PRODUCTION NO. 316**

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

**REQUEST FOR PRODUCTION NO. 317**

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

**REQUEST FOR PRODUCTION NO. 318**

Any and all DOCUMENTS relating to Plaintiff’s complaints about parking issues at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 319**

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

**REQUEST FOR PRODUCTION NO. 320**

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

**REQUEST FOR PRODUCTION NO. 321**

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

**REQUEST FOR PRODUCTION NO. 322**

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

**REQUEST FOR PRODUCTION NO. 323**

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

**REQUEST FOR PRODUCTION NO. 324**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding damage to PLAINTIFF(S) vehicles at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 325**

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

**REQUEST FOR PRODUCTION NO. 326**

Any and all DOCUMENTS which reference or describe damage to PLAINTIFF(S) vehicles at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 327**

Any and all DOCUMENTS which evidence YOUR efforts to address damage to PLAINTIFF(S) vehicles at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 328**

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

**REQUEST FOR PRODUCTION NO. 329**

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

**REQUEST FOR PRODUCTION NO. 330**

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

**REQUEST FOR PRODUCTION NO. 331**

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

**REQUEST FOR PRODUCTION NO. 332**

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

**REQUEST FOR PRODUCTION NO. 333**

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

**REQUEST FOR PRODUCTION NO. 334**

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

**REQUEST FOR PRODUCTION NO. 335**

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

**REQUEST FOR PRODUCTION NO. 336**

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

**REQUEST FOR PRODUCTION NO. 337**

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

**REQUEST FOR PRODUCTION NO. 338**

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

**REQUEST FOR PRODUCTION NO. 339**

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

**REQUEST FOR PRODUCTION NO. 340**

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

**REQUEST FOR PRODUCTION NO. 341**

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

**REQUEST FOR PRODUCTION NO. 342**

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

**REQUEST FOR PRODUCTION NO. 343**

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

**REQUEST FOR PRODUCTION NO. 344**

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

**REQUEST FOR PRODUCTION NO. 345**

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

**REQUEST FOR PRODUCTION NO. 346**

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

**REQUEST FOR PRODUCTION NO. 347**

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

**REQUEST FOR PRODUCTION NO. 348**

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

**REQUEST FOR PRODUCTION NO. 349**

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

**REQUEST FOR PRODUCTION NO. 350**

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

**REQUEST FOR PRODUCTION NO. 351**

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

**REQUEST FOR PRODUCTION NO. 352**

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

**REQUEST FOR PRODUCTION NO. 353**

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

**REQUEST FOR PRODUCTION NO. 354**

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

**REQUEST FOR PRODUCTION NO. 355**

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

**REQUEST FOR PRODUCTION NO. 356**

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

**REQUEST FOR PRODUCTION NO. 357**

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

**REQUEST FOR PRODUCTION NO. 358**

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

**REQUEST FOR PRODUCTION NO. 359**

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

**REQUEST FOR PRODUCTION NO. 360**

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

**REQUEST FOR PRODUCTION NO. 361**

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. 362**

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. 363**

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. 364**

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. 365**

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.

**REQUEST FOR PRODUCTION NO. 366**

Any and alll DOCUMENTS relating to Plaintiff’s complaints about trash issues at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 367**

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

**REQUEST FOR PRODUCTION NO. 368**

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

**REQUEST FOR PRODUCTION NO. 369**

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

**REQUEST FOR PRODUCTION NO. 370**

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

**REQUEST FOR PRODUCTION NO. 371**

Any and all DOCUMENTS relating to Plaintiff’s complaints about inadequate number of receptacles issues at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 372**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding inadequate number of receptacles issues at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 373**

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

**REQUEST FOR PRODUCTION NO. 374**

Any and all DOCUMENTS which reference or describe inadequate number of receptacles issues at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 375**

Any and all DOCUMENTS which evidence YOUR efforts to address the inadequate number of receptacles issues at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 376**

Any and all DOCUMENTS relating to Plaintiff’s complaints about the improperly servicing emptying receptacles issues at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 377**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding improperly servicing emptying receptacles issues at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 378**

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

**REQUEST FOR PRODUCTION NO. 379**

Any and all DOCUMENTS which reference or describe improperly servicing emptying receptacles issues at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 380**

Any and all DOCUMENTS which evidence YOUR efforts to address the improperly servicing emptying receptacles issues at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 381**

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

**REQUEST FOR PRODUCTION NO. 382**

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

**REQUEST FOR PRODUCTION NO. 383**

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

**REQUEST FOR PRODUCTION NO. 384**

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

**REQUEST FOR PRODUCTION NO. 385**

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

**REQUEST FOR PRODUCTION NO. 386**

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

**REQUEST FOR PRODUCTION NO. 387**

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

**REQUEST FOR PRODUCTION NO. 388**

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

**REQUEST FOR PRODUCTION NO. 389**

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

**REQUEST FOR PRODUCTION NO. 390**

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

**REQUEST FOR PRODUCTION NO. 391**

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

**REQUEST FOR PRODUCTION NO. 392**

Any and all DOCUMENTS which evidence YOUR efforts to eradicate issues with noisy neighbors at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 393**

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

**REQUEST FOR PRODUCTION NO. 394**

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

**REQUEST FOR PRODUCTION NO. 395**

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

**REQUEST FOR PRODUCTION NO. 396**

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

**REQUEST FOR PRODUCTION NO. 397**

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

**REQUEST FOR PRODUCTION NO. 398**

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

**REQUEST FOR PRODUCTION NO. 399**

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

**REQUEST FOR PRODUCTION NO. 400**

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

**REQUEST FOR PRODUCTION NO. 401**

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

**REQUEST FOR PRODUCTION NO. 402**

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

**REQUEST FOR PRODUCTION NO. 403**

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

**REQUEST FOR PRODUCTION NO. 404**

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

**REQUEST FOR PRODUCTION NO. 405**

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

**REQUEST FOR PRODUCTION NO. 406**

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

**REQUEST FOR PRODUCTION NO. 407**

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

**REQUEST FOR PRODUCTION NO. 408**

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

**REQUEST FOR PRODUCTION NO. 409**

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

**REQUEST FOR PRODUCTION NO. 410**

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

**REQUEST FOR PRODUCTION NO. 411**

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

**REQUEST FOR PRODUCTION NO. 412**

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

**REQUEST FOR PRODUCTION NO. 413**

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

**REQUEST FOR PRODUCTION NO. 414**

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

**REQUEST FOR PRODUCTION NO. 415**

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

**REQUEST FOR PRODUCTION NO. 416**

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

**REQUEST FOR PRODUCTION NO. 417**

Any DOCUMENTS relating to an unlawful detainer that YOU filed against PLAINTIFF(S) during the past seven years

**REQUEST FOR PRODUCTION NO. 418**

Any DOCUMENTS relating to an unlawful detainer that YOU filed against any PLAINTIFF(S) during the past seven years

**REQUEST FOR PRODUCTION NO. 419**

Any and all DOCUMENTS relating to Plaintiff’s complaints about DEFENDANT making eviction threats against plaintiffs at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 420**

Any and all DOCUMENTS relating to DEFENDANTS' investigation regarding PLAINTIFF's complaints about DEFENDANT making eviction threats against PLAINTIFF(s) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 421**

Any and all DOCUMENTS relating to DEFENDANTS' efforts to address the issues regarding PLAINTIFF'S complaints about DEFENDANT making eviction threats against PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 422**

Any and all DOCUMENTS relating to PLAINTIFF'S complaints about DEFENDANT harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 423**

Any and all DOCUMENTS relating to DEFENDANTS' investigation regarding PLAINTIFF'S complaints about DEFENDANT(S) harssing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 424**

Any and all DOCUMENTS relating to DEFENDANTS  efforts to addrerss the issues regarding PLAINTIFF'S complaints about DEFENDANT(S) harassing the PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 425**

Any and all DOCUMENTS relating to Plaintiff’s complaints about DEFENDANT's maintenanceman workers harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 426**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING DEFENDANTS maintenanceman workers at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 427**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by DEFENDANTS maintenanceman workers at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 428**

Any and all DOCUMENTS which reference or describe harrassment by DEFENDANTS maintenanceman workers at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 429**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding DEFENDANTS maintenanceman workers at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 430**

Any and all DOCUMENTS relating to Plaintiff’s complaints about DEFENDANT's manager building staff harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 431**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING DEFENDANTS manager building staff at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 432**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by DEFENDANTS manager building staff at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 433**

Any and all DOCUMENTS which reference or describe harrassment by DEFENDANTS manager building staff at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 434**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding DEFENDANTS manager building staff at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 435**

Any and all DOCUMENTS relating to Plaintiff’s complaints about DEFENDANT's owner harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 436**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING DEFENDANTS owner at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 437**

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

**REQUEST FOR PRODUCTION NO. 438**

Any and all DOCUMENTS which reference or describe harrassment by DEFENDANTS owner at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 439**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding DEFENDANTS owner at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 440**

Any and all DOCUMENTS relating to Plaintiff’s complaints about other tenants  harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 441**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING other tenants  at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 442**

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

**REQUEST FOR PRODUCTION NO. 443**

Any and all DOCUMENTS which reference or describe harrassment by other tenants  at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 444**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding other tenants  at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 445**

Any and all DOCUMENTS relating to Plaintiff’s complaints about illegitimate notices harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 446**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING illegitimate notices at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 447**

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

**REQUEST FOR PRODUCTION NO. 448**

Any and all DOCUMENTS which reference or describe harrassment by illegitimate notices at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 449**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding illegitimate notices at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 450**

Any and all DOCUMENTS relating to Plaintiff’s complaints about YOUR refusal to make timely repairs harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 451**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING YOUR refusal to make timely repairs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 452**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by YOUR refusal to make timely repairs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 453**

Any and all DOCUMENTS which reference or describe harrassment by YOUR refusal to make timely repairs at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 454**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding YOUR refusal to make timely repairs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 455**

Any and all DOCUMENTS relating to Plaintiff’s complaints about written threats harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 456**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING written threats at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 457**

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

**REQUEST FOR PRODUCTION NO. 458**

Any and all DOCUMENTS which reference or describe harrassment by written threats at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 459**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding written threats at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 460**

Any and all DOCUMENTS relating to Plaintiff’s complaints about aggressive inappropriate language harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 461**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING aggressive inappropriate language at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 462**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by aggressive inappropriate language at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 463**

Any and all DOCUMENTS which reference or describe harrassment by aggressive inappropriate language at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 464**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding aggressive inappropriate language at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 465**

Any and all DOCUMENTS relating to Plaintiff’s complaints about physical threats touching harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 466**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING physical threats touching at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 467**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by physical threats touching at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 468**

Any and all DOCUMENTS which reference or describe harrassment by physical threats touching at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 469**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding physical threats touching at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 470**

Any and all DOCUMENTS relating to Plaintiff’s complaints about notices singling out one tenant harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 471**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING notices singling out one tenant at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 472**

Any and all DOCUMENTS provided to YOU by any PLAINTIFF(S) at the PROPERTY which pertains to claims of harrassment by notices singling out one tenant at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 473**

Any and all DOCUMENTS which reference or describe harrassment by notices singling out one tenant at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 474**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding notices singling out one tenant at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 475**

Any and all DOCUMENTS relating to Plaintiff’s complaints about duplicative notices harassing PLAINTIFF(S) at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 476**

Any and all DOCUMENTS which evidence YOUR efforts to investigate the harrassment complained of by the PLAINTIFF(S) REGARDING duplicative notices at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 477**

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

**REQUEST FOR PRODUCTION NO. 478**

Any and all DOCUMENTS which reference or describe harrassment by duplicative notices at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 479**

Any and all DOCUMENTS which evidence YOUR efforts to address harrassment issues regarding duplicative notices at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 480**

Any and all  notices provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 481**

Any and all 24hour notices provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 482**

Any and all 3DAY notices provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 483**

Any and all 30DAY notices provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 484**

Any and all 60DAY notices provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 485**

Any and all NOTICES TO QUIT provided by YOU to any of the PLAINTIFF(S) in the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 486**

Any and all DOCUMENTS relating to Plaintiff’s complaints about a gas leak at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 487**

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

**REQUEST FOR PRODUCTION NO. 488**

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

**REQUEST FOR PRODUCTION NO. 489**

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

**REQUEST FOR PRODUCTION NO. 490**

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

**REQUEST FOR PRODUCTION NO. 491**

Any and all DOCUMENTS relating to Plaintiff’s complaints about water shutoffs at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 492**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding water shutoffs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 493**

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

**REQUEST FOR PRODUCTION NO. 494**

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

**REQUEST FOR PRODUCTION NO. 495**

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

**REQUEST FOR PRODUCTION NO. 496**

Any and all DOCUMENTS relating to Plaintiff’s complaints about electricty shutoffs at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 497**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding electricity shutoffs at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 498**

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

**REQUEST FOR PRODUCTION NO. 499**

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

**REQUEST FOR PRODUCTION NO. 500**

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

**REQUEST FOR PRODUCTION NO. 501**

Any and all DOCUMENTS relating to Plaintiff’s complaints about an injury at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 502**

Any and all DOCUMENTS which evidence YOUR efforts to inspect the SUBJECT PROPERTY regarding an injury at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 503**

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

**REQUEST FOR PRODUCTION NO. 504**

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

**REQUEST FOR PRODUCTION NO. 505**

Any and all DOCUMENTS relating to Plaintiff’s complaints about a nonresponsive landlord at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 506**

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

**REQUEST FOR PRODUCTION NO. 507**

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

**REQUEST FOR PRODUCTION NO. 508**

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

**REQUEST FOR PRODUCTION NO. 509**

Any and all DOCUMENTS which evidence YOUR efforts to address the complaints about the nonresponsive landlord at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 510**

Any and all DOCUMENTS relating to Plaintiff’s complaints about unauthorized entries to their UNIT at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 511**

Any and all DOCUMENTS which evidence YOUR efforts to investigate PLAINTIFFS claims regarding unauthorized entries to their UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 512**

Any and all DOCUMENTS provided to YOU by any plaintiff(S) at the PROPERTY which pertains to unauthorized entries to their UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 513**

Any and all DOCUMENTS which reference or describe unauthorized entries to their UNIT at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 514**

Any and all DOCUMENTS which evidence YOUR efforts to address the complaints about unauthorized entries to PLAINTIFF(S) UNIT at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 515**

Any and all DOCUMENTS relating to Plaintiff’s complaints about stolen items at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 516**

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

**REQUEST FOR PRODUCTION NO. 517**

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

**REQUEST FOR PRODUCTION NO. 518**

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

**REQUEST FOR PRODUCTION NO. 519**

Any and all DOCUMENTS which evidence YOUR efforts to address the complaints about stolen items at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 520**

Any and all DOCUMENTS relating to Plaintiff’s complaints about damaged items at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 521**

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

**REQUEST FOR PRODUCTION NO. 522**

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

**REQUEST FOR PRODUCTION NO. 523**

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

**REQUEST FOR PRODUCTION NO. 524**

Any and all DOCUMENTS which evidence YOUR efforts to address the complaints about damaged items at the SUBJECT PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 525**

Any and all DOCUMENTS relating to Plaintiff’s complaints about a broken security gate at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 526**

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

**REQUEST FOR PRODUCTION NO. 527**

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

**REQUEST FOR PRODUCTION NO. 528**

Any and all DOCUMENTS which reference or describe a broken security gate at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 529**

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

**REQUEST FOR PRODUCTION NO. 530**

Any and all DOCUMENTS relating to Plaintiff’s complaints about a broken buzzer to get into the building at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 531**

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

**REQUEST FOR PRODUCTION NO. 532**

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

**REQUEST FOR PRODUCTION NO. 533**

Any and all DOCUMENTS which reference or describe a broken buzzer to get into the building at the PROPERTY during the past seven (7) years.

**REQUEST FOR PRODUCTION NO. 534**

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

**REQUEST FOR PRODUCTION NO. 535**

Any and all DOCUMENTS relating to Plaintiff’s complaints about security cameras at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 536**

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

**REQUEST FOR PRODUCTION NO. 537**

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

**REQUEST FOR PRODUCTION NO. 538**

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

**REQUEST FOR PRODUCTION NO. 539**

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

**REQUEST FOR PRODUCTION NO. 540**

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

**REQUEST FOR PRODUCTION NO. 541**

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

**REQUEST FOR PRODUCTION NO. 542**

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

**REQUEST FOR PRODUCTION NO. 543**

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

**REQUEST FOR PRODUCTION NO. 544**

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

**REQUEST FOR PRODUCTION NO. 545**

Any and all DOCUMENTS relating to Plaintiff’s complaints about unauthorized entries at the PROPERTY during the past 7 years.

**REQUEST FOR PRODUCTION NO. 546**

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

**REQUEST FOR PRODUCTION NO. 547**

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

**REQUEST FOR PRODUCTION NO. 548**

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

**REQUEST FOR PRODUCTION NO. 549**

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

**REQUEST FOR PRODUCTION NO. 550**

Any and all DOCUMENTS identifying or relating to each person who participated in or influenced any decision to deny repair request(s) to PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 551**

Any and all DOCUMENTS showing when and how DEFENDANTS first became aware of PLAINTIFF(S)’ age(s), including correspondence, applications, tenant files, or identification records.

**REQUEST FOR PRODUCTION NO. 552**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend justified the housing decision(s) regarding PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 553**

Any and all DOCUMENTS identifying or relating to tenants under the age of forty (40) who received more favorable terms, repairs, or services during the same time period PLAINTIFF(S) lived at the PROPERTY.

**REQUEST FOR PRODUCTION NO. 554**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend explain any difference in treatment between PLAINTIFF(S) and the tenants identified in YOUR response to the previous request for production.

**REQUEST FOR PRODUCTION NO. 555**

Any and all written or unwritten policies, guidelines, manuals, or procedures in effect during PLAINTIFF(S)’ tenancy relating to allocation of repairs or services.

**REQUEST FOR PRODUCTION NO. 556**

Any and all DOCUMENTS relating to any policy, formal or informal, concerning housing for tenants over a certain age.

**REQUEST FOR PRODUCTION NO. 557**

Any and all oral or written communications in which YOU or YOUR agents made reference to PLAINTIFF(S)’ age in connection with housing decisions.

**REQUEST FOR PRODUCTION NO. 558**

Any and all DOCUMENTS relating to any statements, oral or written, by YOU or YOUR agents regarding preferring younger tenants.

**REQUEST FOR PRODUCTION NO. 559**

Any and all complaints, grievances, administrative charges, or legal claims alleging age discrimination in housing made against YOU in the past ten (10) years, including any DOCUMENTS reflecting the resolution or settlement of each.

**REQUEST FOR PRODUCTION NO. 560**

Any and all DOCUMENTS relating to any investigation conducted into PLAINTIFF(S)’ allegations of age discrimination, including investigator notes, reports, and findings.

**REQUEST FOR PRODUCTION NO. 561**

Any and all DOCUMENTS relating to any consideration of a tenant’s age in making decisions about rent increases.

**REQUEST FOR PRODUCTION NO. 562**

Any and all DOCUMENTS identifying or relating to tenants over the age of sixty (60) who were issued a notice to quit, notice to vacate, or nonrenewal of lease in the past ten (10) years, including the reasons for each.

**REQUEST FOR PRODUCTION NO. 563**

Any and all DOCUMENTS relating to any offering of housing units, amenities, or services exclusively or preferentially to tenants under a certain age.

**REQUEST FOR PRODUCTION NO. 564**

Any and all advertisements, listings, or promotional materials for the subject PROPERTY in the past ten (10) years that made reference to preferred tenant age, lifestyle, or “young professionals,” including drafts and communications about their creation.

**REQUEST FOR PRODUCTION NO. 565**

Any and all DOCUMENTS relating to any instance where YOU denied a repair request from PLAINTIFF(S) and granted a similar request from a younger tenant.

**REQUEST FOR PRODUCTION NO. 566**

Any and all DOCUMENTS relating to occasions in the past ten (10) years where YOU relocated tenants over a certain age to different units, including the reasons for each relocation.

**REQUEST FOR PRODUCTION NO. 567**

Any and all DOCUMENTS relating to any statements, oral or written, by YOU or YOUR agents about older tenants being “harder to insure,” “too old to climb stairs,” or other agerelated remarks.

**REQUEST FOR PRODUCTION NO. 568**

Any and all DOCUMENTS relating to occasions in the past ten (10) years where YOU offered lease incentives (such as reduced rent or free upgrades) to younger tenants but not to older tenants.

**REQUEST FOR PRODUCTION NO. 569**

Any and all DOCUMENTS relating to any discussions with insurance providers, lenders, or PROPERTY managers regarding tenant age demographics.

**REQUEST FOR PRODUCTION NO. 570**

Any and all DOCUMENTS identifying or relating to persons who have complained to YOU or YOUR agents about alleged age discrimination in housing within the past ten (10) years, including YOUR responses to each complaint.

**REQUEST FOR PRODUCTION NO. 571**

Any and all DOCUMENTS identifying or relating to each person who participated in or influenced the decision to issue notices to PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 572**

Any and all DOCUMENTS showing when and how each such person first became aware of PLAINTIFF(S)’ disability, including correspondence, notes, emails, applications, or tenant files.

**REQUEST FOR PRODUCTION NO. 573**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend justified any adverse housing decision regarding PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 574**

Any and all DOCUMENTS relating to each request for reasonable accommodation made by PLAINTIFF(S), including the date, nature of the request, and YOUR response.

**REQUEST FOR PRODUCTION NO. 575**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend justified any denial, delay, or modification of PLAINTIFF(S)’ request for accommodation.

**REQUEST FOR PRODUCTION NO. 576**

Any and all DOCUMENTS relating to any occasion in which YOU granted a reasonable accommodation to a tenant without a disability while denying a similar accommodation to PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 577**

Any and all DOCUMENTS identifying or relating to tenants without disabilities who were granted housing, lease renewals, repairs, or modifications under similar circumstances as PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 578**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend explain any difference in treatment between PLAINTIFF(S) and the tenants identified in response to the previous two requests for production.

**REQUEST FOR PRODUCTION NO. 579**

Any and all DOCUMENTS identifying or relating to tenants with disabilities who have resided at the PROPERTY within the past ten (10) years, including whether they received accommodations.

**REQUEST FOR PRODUCTION NO. 580**

Any and all written or unwritten policies, guidelines, manuals, or procedures in effect during PLAINTIFF(S)’ tenancy relating to disability accommodations, modifications, tenant selection, lease renewal, rent increases, repairs, or eviction.

**REQUEST FOR PRODUCTION NO. 581**

All training materials, manuals, handbooks, or other documents provided to employees or agents regarding disability rights, reasonable accommodations, or modifications.

**REQUEST FOR PRODUCTION NO. 582**

Any and all DOCUMENTS identifying or relating to persons responsible for implementing YOUR disability accommodation policies at the PROPERTY.

**REQUEST FOR PRODUCTION NO. 583**

Any and all oral or written communications in which YOU or YOUR agents made reference to PLAINTIFF(S)’ disability in connection with housing decisions.

**REQUEST FOR PRODUCTION NO. 584**

Any and all DOCUMENTS relating to any statements, oral or written, by YOU or YOUR agents about tenants with disabilities being “too costly,” “too difficult,” or otherwise undesirable.

**REQUEST FOR PRODUCTION NO. 585**

Any and all communications between YOU and any third party (including but not limited to PROPERTY managers, HOAs, insurance providers, or lenders) regarding PLAINTIFF(S)’ disability.

**REQUEST FOR PRODUCTION NO. 586**

Any and all complaints, grievances, administrative charges, or lawsuits alleging disability discrimination in housing made against YOU in the past ten (10) years, including any DOCUMENTS reflecting the resolution or settlement of each.

**REQUEST FOR PRODUCTION NO. 587**

Any and all DOCUMENTS relating to any investigation conducted into PLAINTIFF(S)’ allegations of disability discrimination, including investigator notes, reports, and findings.

**REQUEST FOR PRODUCTION NO. 588**

Any and all DOCUMENTS relating to any contact by any government agency regarding alleged disability discrimination in housing, including correspondence, notices, or investigation results.

**REQUEST FOR PRODUCTION NO. 589**

Any and all DOCUMENTS identifying or relating to instances in the past ten (10) years where YOU took adverse action against a tenant after they requested a disabilityrelated accommodation, including the reasons for each.

**REQUEST FOR PRODUCTION NO. 590**

Any and all DOCUMENTS relating to any discussion, consideration, or record of the presence of a service animal, mobility aid, or other disabilityrelated device in connection with housing decisions.

**REQUEST FOR PRODUCTION NO. 591**

Any and all DOCUMENTS identifying or relating to each person who participated in or influenced the decision to issue notices to PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 592**

Any and all DOCUMENTS showing when and how each such person first became aware of PLAINTIFF(S)’ race, including but not limited to correspondence, notes, emails, applications, or tenant files.

**REQUEST FOR PRODUCTION NO. 593**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend justified any adverse housing decision regarding PLAINTIFF(S).

**REQUEST FOR PRODUCTION NO. 594**

Any and all DOCUMENTS identifying or relating to tenants of a different race than PLAINTIFF(S) whose similar repair requests were approved while PLAINTIFF(S)’ request(s) was denied.

**REQUEST FOR PRODUCTION NO. 595**

Any and all DOCUMENTS identifying or relating to tenants of a different race than PLAINTIFF(S) who received more favorable terms, rent amounts, repairs, or services during the same time period as PLAINTIFF(S)’ tenancy.

**REQUEST FOR PRODUCTION NO. 596**

Any and all DOCUMENTS reflecting or supporting the reasons YOU contend explain the differences in treatment between PLAINTIFF(S) and the tenants identified in response to the previous two requests for production.

**REQUEST FOR PRODUCTION NO. 597**

Any and all written or unwritten policies, guidelines, manuals, or procedures in effect during PLAINTIFF(S)’ tenancy relating to tenant selection, screening, lease renewal, rent increases, repairs, or eviction.

**REQUEST FOR PRODUCTION NO. 598**

Any and all DOCUMENTS relating to any policy, formal or informal, to limit the number of tenants of a particular race at the PROPERTY.

**REQUEST FOR PRODUCTION NO. 599**

Any and all DOCUMENTS relating to the use of tenant screening criteria (including but not limited to credit score, criminal background, rental history) applied differently based on race, including any communications or records of such practices.

**REQUEST FOR PRODUCTION NO. 600**

Any and all oral or written communications in which YOU or YOUR agents made reference to PLAINTIFF(S)’ race in connection with housing decisions.

**REQUEST FOR PRODUCTION NO. 601**

Any and all DOCUMENTS relating to any statements, oral or written, by YOU or YOUR agents indicating a preference for tenants of a particular race.

**REQUEST FOR PRODUCTION NO. 602**

Any and all advertisements, rental listings, or promotional materials in the past ten (10) years that suggest a racial preference or discourage tenants of a certain race.

**REQUEST FOR PRODUCTION NO. 603**

Any and all complaints, grievances, administrative charges, or lawsuits alleging racial discrimination in housing made against YOU in the past ten (10) years, including any DOCUMENTS reflecting the resolution or settlement of each.

**REQUEST FOR PRODUCTION NO. 604**

Any and all DOCUMENTS relating to any investigation conducted into PLAINTIFF(S)’ allegations of racial discrimination, including investigator notes, reports, and findings.

**REQUEST FOR PRODUCTION NO. 605**

Any and all DOCUMENTS relating to any contact by any government agency regarding alleged racial discrimination in housing, including correspondence, notices, or investigation results.

**REQUEST FOR PRODUCTION NO. 606**

Any and all DOCUMENTS identifying or relating to notices to quit, eviction notices, or nonrenewals issued to tenants of PLAINTIFF(S)’ race in the past ten (10) years, including the reasons for each.

**REQUEST FOR PRODUCTION NO. 607**

Any and all DOCUMENTS relating to any adverse action taken against a tenant after they complained about racial discrimination, including communications, notes, and decisionmaking records.

**REQUEST FOR PRODUCTION NO. 608**

Any and all DOCUMENTS reflecting the racial composition of tenants at the PROPERTY for the year before and the year after PLAINTIFF(S)’ tenancy, including any demographic reports, tenant lists, or occupancy records.

**REQUEST FOR PRODUCTION NO. 609**

Any and all DOCUMENTS relating to any discussion, consideration, or analysis of the racial makeup of the tenant population in connection with rental, renewal, or eviction decisions.

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

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Kevin Lipton, Esq.

**Attorney for Plaintiff:**