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Attorney for Plaintiff:

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF – CENTRAL DISTRICT**

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| --- | --- |
| **CLARK KENT, INDIVIDUAL; LOIS LANE, GUARDIAN; BRUCE WAYNE, INDIVIDUAL**  **vs.**  **and DOES 1 to 25, inclusive**  **Defendants.** | **Case No.**  **PLAINTIFF CLARK KENT‘S REQUEST FOR SPECIAL INTERROGATORIES TO DEFENDANTS, STEVE ROGERS‘S, SET NO. (4) Four** |

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Requesting party: **Plaintiff, Clark Kent**

Responding party: **Defendant(s),** **Steve Rogers**

Set No.: **Four (4)**

TO DEFENDANT(S) STEVE ROGERS AND THEIR ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff requests that Defendant(s), Steve Rogers, respond to the following Special Interrogatories 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 interrogatories, furnish all information that is available to YOU. If YOU cannot answer an interrogatory completely, answer it to the extent possible. If a special interrogatory 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 special interrogatory may be located.

If a special interrogatory requests the identification of a person or business, please make certain that the name, address, and telephone number are provided fully in response to each such special interrogatory.

If YOU do not have a personal knowledge sufficient to respond fully to an interrogatory, 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(S) Steve Rogers, 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(s), 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 Clark Kent.
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 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 propounded 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 PLAINTIFF’s 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 document.
12. As used herein, the term **“WRITING”** is used to 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 constructed, 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:
    1. The nature of the document;
    2. The date the document was executed, if different from the date it bears; and
    3. The identity and most recent known address of the **PERSON** or entity that has custody or control of such document
17. As used herein, the term **“PROPERTY”** or **“UNIT”** refers to real property and residential dwelling located at 1331 Yorkshire Place NW Unit 1, Los Angeles, North Carolina, 28027.

**SPECIAL INTERROGATORIES**

**SPECIAL INTERROGATORY NO. 331**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 332**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 333**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 334**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to those complaints regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 335**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding a malfunctioning plumbing leak(s) in his UNIT at the PROPERTY, did you ever send a licensed contractor/plumber to address the complaint?

**SPECIAL INTERROGATORY NO. 336**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite his/her malfunctioning plumbing leak(s)?

**SPECIAL INTERROGATORY NO. 337**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their malfunctioning plumbing leak(s) issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 338**

Identify all persons, including PLAINTIFF(S) and contractors, who have reported raw sewage on the exterior or water intrusion issues at the PROPERTY within the last ten years.

**SPECIAL INTERROGATORY NO. 339**

State the date on which YOU first became aware of the presence of raw sewage on the exterior in any UNIT at the PROPERTY in the last ten years..

**SPECIAL INTERROGATORY NO. 340**

IDENTIFY all complaints received by YOU or anyone acting on YOUR behald regarding raw sewage on the exterior or water damage at the PROPERTY in the past ten years.

**SPECIAL INTERROGATORY NO. 341**

IDENTIFY all inspections conducted at the PROPERTY by the DEFENDANTS or on the DEFENDANTS' behalf concerning raw sewage on the exterior or water damage in the last ten years.

**SPECIAL INTERROGATORY NO. 342**

Describe in detail all actions taken by the DEFENDANTS to repair or mitigate raw sewage on the exterior or water intrusion at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 343**

IDENTIFY all contractors, vendors, or maintenance personnel hired by the defendant to inspect, repair, or remediate raw sewage on the exterior at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 344**

Describe any measures taken by the DEFENDANTS to inspect or address raw sewage on the exterior or water damage at the PROPERTY prior to the PLAINTIFF's occupancy.

**SPECIAL INTERROGATORY NO. 345**

State whether the DEFENDANTS have a policy or procedure for addressing raw sewage on the exterior-related issues, and if so, describe it in detail.

**SPECIAL INTERROGATORY NO. 346**

IDENTIFY all documents provided to PLAINTIFF concerning raw sewage on the exterior, including prevention, detection, and reporting.

**SPECIAL INTERROGATORY NO. 347**

Describe any steps the DEFENDANTS have taken to prevent raw sewage on the exterior from forming at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 348**

IDENTIFY all communications between the DEFENDANT and the PLAINTIFF regarding the presence of raw sewage on the exterior at the PROPERTY.

**SPECIAL INTERROGATORY NO. 349**

State whether the DEFENDANTS provided written notice to the PLAINTIFF of the presence of raw sewage on the exterior at the PROPERTY and, if so, identify the date and contents of the notice.

**SPECIAL INTERROGATORY NO. 350**

IDENTIFY all communications between the DEFENDANTS and third parties (e.g., insurance companies, remediation specialists) regarding raw sewage on the exterior at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 351**

Describe any government inspections or violations cited to the DEFENDANTS regarding raw sewage on the exterior or water damage at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 352**

State whether the DEFENDANTS received any legal claims, lawsuits, or demands related to raw sewage on the exterior issues at the PROPERTY in the last ten years and, if so, identify the date, claimant, and resolution of each claim.

**SPECIAL INTERROGATORY NO. 353**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF filed any lawsuits against PLAINTIFF(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 354**

If YOU OR ANYONE ACTING ON YOUR BEHALF have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, please provide the case number. have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, please provide the case number. have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, please provide the case number.

**SPECIAL INTERROGATORY NO. 355**

If YOU OR ANYONE ACTING ON YOUR BEHALF have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, what was the result of the lawsuit?

**SPECIAL INTERROGATORY NO. 356**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF filed any lawsuits against any PLAINTIFF(s) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 357**

If YOU OR ANYONE ACTING ON YOUR BEHALF have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, please provide the case number.

**SPECIAL INTERROGATORY NO. 358**

If YOU OR ANYONE ACTING ON YOUR BEHALF have filed a lawsuit against any PLAINTIFF(S) at the PROPERTY in the last ten years, what was the result of the lawsuit?

**SPECIAL INTERROGATORY NO. 359**

If YOU or ANYONE acting on YOUR behalf have filed a lawsuit against PLAINTIFF(S) in the last ten years, did PLAINTIFF(S) accuse you of harassing them?

**SPECIAL INTERROGATORY NO. 360**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding harassment from the maintenance man/workers at the PROPERTY?

**SPECIAL INTERROGATORY NO. 361**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the maintenance man/workers at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 362**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the maintenance man/workers at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 363**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the maintenance man/workers at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 364**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from the maintenance man/workers at the PROPERTY?

**SPECIAL INTERROGATORY NO. 365**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from the maintenance man/workers at the PROPERTY?

**SPECIAL INTERROGATORY NO. 366**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding harassment from the other tenant(s) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 367**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the other tenant(s) at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 368**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the other tenant(s) at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 369**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from the other tenant(s) at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 370**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from the other tenant(s) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 371**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from the other tenant(s) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 372**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY?

**SPECIAL INTERROGATORY NO. 373**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 374**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 375**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 376**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY?

**SPECIAL INTERROGATORY NO. 377**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from DEFENDANT(S)' refusal to make timely repairs at the PROPERTY?

**SPECIAL INTERROGATORY NO. 378**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 379**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 380**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 381**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 382**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 383**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from physical threats or touching by DEFENDANT(S) at the PROPERTY?

**Dated this \_\_\_\_\_\_\_\_\_**

**LIPTON LEGAL GROUP, APC**

KEVIN LIPTON, ESQ.

Attorney for Plaintiff(s):

**PROOF OF SERVICE**

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

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action; my business address is 9478 W. Olympic Blvd. #308, Beverly Hills, CA 90212

On **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** I served the foregoing documents, described as **PLAINTIFF CLARK KENT,’S REQUEST FOR ADMISSION FOR \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**, on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**SEE ATTACHED SERVICE LIST**

**[BY MAIL]**

I deposited such envelope in the mail at Beverly Hills, California. The envelope was mailed

with postage prepaid thereon fully prepaid.

**[BY PERSONAL SERVICE]** I caused such envelope to be delivered by hand to a

representative of the addressee, pursuant to *Code of Civil Procedure,* §*1011*.

Executed on **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**, at Beverly Hills, California.

**[BY FACSIMILE]** In addition to service by mail as set forth above, a copy of said

document was delivered by facsimile transmission to the addressee pursuant to *Code of*

*Civil Procedure, §1013(e)*

Executed on **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**, at Beverly Hills, California.

**[BY EXPRESS MAIL]** I caused said documents with fees thereon fully prepaid for

overnight delivery to the above address to be deposited in a box or other facility regularly

maintained by an express courier providing overnight delivery pursuant to *Code of Civil*

*Procedure, §1013(g)*.

Executed on **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**, at Beverly Hills, California.

**[BY ELECTRONIC MAIL]**

A copy of said document was delivered by electronic transmission to the addressee pursuant to *Code of Civil Procedure, §1013(g), CRC Rule 2.251, & §1010.6(a)*

Executed on **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**, at Beverly Hills, California

**[STATE]** I declare under penalty of perjury under the laws of the State of California, that

the above is true and correct.

**[FEDERAL]**  I declare that I am employed in the office of a member of the bar of this

court at whose direction the service was made.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Type or Print Name) (Signature)