Kevin Lipton, Esq. SBN #291739

Lipton Legal Group, APC

9478 W. Olympic Blvd. Suite #308

Beverly Hills, California 90212

Tel: (310) 855-7556

Fax: (310) 788-3840

Email: Kevin@LiptonLegal.com

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. (8) Eight** |

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Requesting party: **Plaintiff, Clark Kent**

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

Set No.: **Eight (8)**

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. 806**

State the date of any and all fumigations for termites performed on YOUR behalf while YOU have owned or managed the PROPERTY.

**SPECIAL INTERROGATORY NO. 807**

If the SUBJECT PROPERTY has been fumigated for termites since you have owned or managed the SUBJECT PROPERTY, IDENTIFY the PERSON performing the fumigation.

**SPECIAL INTERROGATORY NO. 808**

State whether PLAINTIFF(S) were provided pest control products while YOU have owned or managed the PROPERTY in the past seven (7) years.

**SPECIAL INTERROGATORY NO. 809**

IDENTIFY all DOCUMENTS concerning any provision to PLAINTIFF(S) of pest control products while you have owned or managed the PROPERTY in the past seven (7) years.

**SPECIAL INTERROGATORY NO. 810**

State any occasion on which YOU received COMMUNICATIONS from each PLAINTIFF(S) of the PROPERTY regarding termites, while YOU have owned the PROPERTY in the past seven (7) years.

**SPECIAL INTERROGATORY NO. 811**

For each COMMUNICATION identified in YOUR response to the previous SPECIAL INTERROGATORY above, IDENTIFY any remedy that was taken.

**SPECIAL INTERROGATORY NO. 812**

For each remedy identified in YOUR response to THE PREVIOUS SPECIAL INTERROGATORY above, state the date of the remedy.

**SPECIAL INTERROGATORY NO. 813**

IDENTIFY each DOCUMENT concerning any remedy YOU undertook in response to complaints of termites at the SUBJECT PROPERTY.

**SPECIAL INTERROGATORY NO. 814**

For each remedy identified in YOUR response to the previous SPECIAL INTERROGATORY above, state the cost of the remedy.

**SPECIAL INTERROGATORY NO. 815**

Within the past seven years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaint regarding termites in the SUBJECT PREMISES?

**SPECIAL INTERROGATORY NO. 816**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding termites in the SUBJECT PREMISES, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 817**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding termites in the SUBJECT PREMISES, IDENTIFY each and every PERSON who made the complaint.

**SPECIAL INTERROGATORY NO. 818**

IDENTIFY all DOCUMENTS RELATED TO termite issues at the PROPERTY during the past 7 years.

**SPECIAL INTERROGATORY NO. 819**

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

**SPECIAL INTERROGATORY NO. 820**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding heater in PLAINTIFF(S) 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. 821**

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

**SPECIAL INTERROGATORY NO. 822**

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

**SPECIAL INTERROGATORY NO. 823**

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

**SPECIAL INTERROGATORY NO. 824**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) heater?

**SPECIAL INTERROGATORY NO. 825**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their heater issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 826**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding air conditioner in PLAINTIFF(S) UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 827**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding air conditioner in PLAINTIFF(S) 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. 828**

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

**SPECIAL INTERROGATORY NO. 829**

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

**SPECIAL INTERROGATORY NO. 830**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding air conditioner in PLAINTIFF(S)' UNIT at the PROPERTY, did you ever send a licensed contractor/HVAC specialist to address the complaint?

**SPECIAL INTERROGATORY NO. 831**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) air conditioner?

**SPECIAL INTERROGATORY NO. 832**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their air conditioner issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 833**

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

**SPECIAL INTERROGATORY NO. 834**

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 washer/dryer in PLAINTIFF(S)' 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. 835**

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 washer/dryer in PLAINTIFF(S)' UNIT at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 836**

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 washer/dryer in PLAINTIFF(S)' UNIT at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to those complaints regarding a malfunctioning washer/dryer in PLAINTIFF(S)' UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 837**

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 washer/dryer in PLAINTIFF(S)' UNIT at the PROPERTY, did you ever send a licensed contractor/plumber to address the complaint?

**SPECIAL INTERROGATORY NO. 838**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)'/her malfunctioning washer/dryer?

**SPECIAL INTERROGATORY NO. 839**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their malfunctioning washer/dryer issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 840**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding nail(s) sticking out of the floor in PLAINTIFF(S) UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 841**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding nail(s) sticking out of the floor in PLAINTIFF(S) 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. 842**

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

**SPECIAL INTERROGATORY NO. 843**

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

**SPECIAL INTERROGATORY NO. 844**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding nail(s) sticking out of the floor in PLAINTIFF(S)' UNIT at the PROPERTY, did you ever send a licensed contractor to address the complaint?

**SPECIAL INTERROGATORY NO. 845**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) nail(s) sticking out of the floor?

**SPECIAL INTERROGATORY NO. 846**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their nail(s) sticking out of the floor issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 847**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding water stain(s) on the ceiling in PLAINTIFF(S) UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 848**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding water stain(s) on the ceiling in PLAINTIFF(S) 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. 849**

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

**SPECIAL INTERROGATORY NO. 850**

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

**SPECIAL INTERROGATORY NO. 851**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding water stain(s) on the ceiling in PLAINTIFF(S)' UNIT at the PROPERTY, did you ever send a licensed contractor to address the complaint?

**SPECIAL INTERROGATORY NO. 852**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) water stain(s) on the ceiling?

**SPECIAL INTERROGATORY NO. 853**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their water stain(s) on the ceiling issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 854**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding hole(s) on the wall in PLAINTIFF(S) UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 855**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding hole(s) on the wall in PLAINTIFF(S) 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. 856**

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

**SPECIAL INTERROGATORY NO. 857**

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

**SPECIAL INTERROGATORY NO. 858**

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

**SPECIAL INTERROGATORY NO. 859**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) hole(s) on the wall?

**SPECIAL INTERROGATORY NO. 860**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their hole(s) on the wall issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 861**

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

**SPECIAL INTERROGATORY NO. 862**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding unannounced water shut off(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. 863**

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

**SPECIAL INTERROGATORY NO. 864**

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

**SPECIAL INTERROGATORY NO. 865**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding unannounced water shut off(s) at the PROPERTY, did you ever send a licensed contractor to address the complaint?

**SPECIAL INTERROGATORY NO. 866**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) unannounced water shut off(s)?

**SPECIAL INTERROGATORY NO. 867**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their unannounced water shut off(s) issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 868**

State any and all measures taken by YOU or any of YOUR agents to prevent unannounced water shut off(s) the PROPERTY.

**SPECIAL INTERROGATORY NO. 869**

State any occasion on which YOU or any of YOUR agents arranged for maintenance, including plumbing at the PROPERTY that resulted in an unannounced water shutoff.

**SPECIAL INTERROGATORY NO. 870**

Within the past seven years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any injuries alleged to have been suffered by any PERSON who claimed to have been injured on the SUBJECT PREMISES?

**SPECIAL INTERROGATORY NO. 871**

For each claim that YOU OR ANYONE ACTING ON YOUR BEHALF became aware of within the past seven years regarding any injuries alleged to have been suffered by any PERSON who claimed to have been injured on the SUBJECT PREMISES, identify the claim (including the date, time and location of the alleged injury and the date claim was received.

**SPECIAL INTERROGATORY NO. 872**

For each claim that YOU OR ANYONE ACTING ON YOUR BEHALF became aware of within the past seven years regarding any injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES, IDENTIFY the allegedly injured claimant.

**SPECIAL INTERROGATORY NO. 873**

For each claim that YOU OR ANYONE ACTING ON YOUR BEHALF became aware of within the past seven years regarding any injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES, IDENTIFY each such claimant’s attorney.

**SPECIAL INTERROGATORY NO. 874**

Within the past seven years, have YOU OR ANYONE ACTING ON YOUR BEHALF been a defendant in any personal injury lawsuits regarding injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES?

**SPECIAL INTERROGATORY NO. 875**

If, within the past seven years, YOU OR ANYONE ACTING ON YOUR BEHALF have been a defendant in any personal injury lawsuits regarding injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES, identify each such lawsuit (including the date the litigation was filed, the court where it was filed, the case name, and the case number).

**SPECIAL INTERROGATORY NO. 876**

If, within the past seven years, YOU OR ANYONE ACTING ON YOUR BEHALF have been a defendant in any personal injury lawsuits regarding injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES, IDENTIFY the lawyer(s) who represented the plaintiff.

**SPECIAL INTERROGATORY NO. 877**

If, within the past seven years, YOU OR ANYONE ACTING ON YOUR BEHALF have been a defendant in any personal injury lawsuits regarding injuries alleged to have been suffered by any PERSON in the SUBJECT PREMISES, state the date of the alleged injury-producing incident

**SPECIAL INTERROGATORY NO. 878**

IDENTIFY each person who participated in or influenced any decision to deny repair request(s) to PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 879**

State the date and manner in which DEFENDANTS first became aware of PLAINTIFF(S)’ age(s).

**SPECIAL INTERROGATORY NO. 880**

State all reasons YOU contend justified any housing decision(s) regarding PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 881**

IDENTIFY all tenants under the age of 40 who received more favorable terms, repairs, or services during the same time-period PLAINTIFF(S) lived at the PROPERTY.

**SPECIAL INTERROGATORY NO. 882**

For each such tenant, state the reasons YOU contend to explain any difference in treatment compared to PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 883**

IDENTIFY all written or unwritten policies in effect PLAINTIFF(S) tenancy(s) that related to allocation of repairs or services.

**SPECIAL INTERROGATORY NO. 884**

State whether YOU have ever had a policy, formal or informal, concerning housing for tenants over a certain age, and if so, describe it in detail.

**SPECIAL INTERROGATORY NO. 885**

IDENTIFY each oral or written communication in which YOU or YOUR agents made reference to PLAINTIFF(S)’ age in connection with housing decisions.

**SPECIAL INTERROGATORY NO. 886**

State whether YOU or any of YOUR agents have ever made a statement regarding preferring younger tenants, and if so, describe each statement, including the date, speaker, and audience.

**SPECIAL INTERROGATORY NO. 887**

IDENTIFY all complaints, grievances, administrative charges, or legal claims alleging age discrimination in housing made against YOU in the past ten years and state the resolution or outcome of each.

**SPECIAL INTERROGATORY NO. 888**

State whether YOU conducted any investigation into PLAINTIFF(S)’ allegations of age discrimination, and if so, IDENTIFY the person(s) who conducted the investigation and summarize the findings.

**SPECIAL INTERROGATORY NO. 889**

State whether YOU have ever considered a tenant’s age in making decisions about rent increases, and if so, describe the circumstances.

**SPECIAL INTERROGATORY NO. 890**

IDENTIFY all tenants over the age of 60 who were issued a notice to quit, notice to vacate, or non-renewal of lease in the past ten years, and state the reasons for each.

**SPECIAL INTERROGATORY NO. 891**

State whether YOU have ever offered housing units, amenities, or services exclusively or preferentially to tenants under a certain age, and if so, describe the practice.

**SPECIAL INTERROGATORY NO. 892**

IDENTIFY all advertisements, listings, or promotional materials for the subject PROPERTY in the past ten years that made reference to preferred tenant age, lifestyle, or “young professionals,” and state who created them.

**SPECIAL INTERROGATORY NO. 893**

State whether YOU have ever denied a repair request from PLAINTIFF(S) and granted a similar request from a younger tenant, and if so, describe each instance.

**SPECIAL INTERROGATORY NO. 894**

IDENTIFY all occasions in the past ten years where YOU relocated tenants over a certain age to different units and state the reasons for each relocation.

**SPECIAL INTERROGATORY NO. 895**

State whether YOU have ever made statements about older tenants being “harder to insure,” “too old to climb stairs,” or similar age-related remarks, and if so, describe the statements.

**SPECIAL INTERROGATORY NO. 896**

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

**SPECIAL INTERROGATORY NO. 897**

State whether YOU have ever had discussions with insurance providers, lenders, or PROPERTY managers regarding tenant age demographics, and describe the content of such discussions.

**SPECIAL INTERROGATORY NO. 898**

IDENTIFY all persons who have complained to YOU or YOUR agents about alleged age discrimination in housing within the past five years, and state how YOU responded to each complaint.

**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)