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Attorney for Plaintiff:

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF – CENTRAL DISTRICT**

|  |  |
| --- | --- |
| **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, TONY STARK‘S, SET NO. (1) One** |

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

Requesting party: **Plaintiff, Clark Kent**

Responding party: **Defendant(s),** **Tony Stark**

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

TO DEFENDANT(S) TONY STARK AND THEIR ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff requests that Defendant(s), Tony Stark, 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) Tony Stark, 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), 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 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. 1**

IDENTIFY all PERSONS supplying information used in answering these Interrogatories.

**SPECIAL INTERROGATORY NO. 2**

State whether YOU ever provided a relocation/reduction in rent as a result of conditions which PLAINTIFF(S) reported to YOU.

**SPECIAL INTERROGATORY NO. 3**

IDENTIFY any and all building managers at the PROPERTY since you owned/contracted with the PROPERTY

**SPECIAL INTERROGATORY NO. 4**

IDENTIFY any and all building managers at the PROPERTY since you owned/contracted with the PROPERTY's roles

**SPECIAL INTERROGATORY NO. 5**

IDENTIFY any and all training building managers at the PROPERTY received since you owned/contracted with the PROPERTY

**SPECIAL INTERROGATORY NO. 6**

Explain the hiring process for any and all building managers at the PROPERTY since you owned/contracted with the PROPERTY

**SPECIAL INTERROGATORY NO. 7**

Did any  building managers at the PROPERTY since you owned/contracted with the PROPERTY not live onsite at the PROPERTY?

**SPECIAL INTERROGATORY NO. 8**

Have YOU ever received any complaints from PLAINTIFF(S) at the PROPERTY that the PROPERTY's manager gave them incorrect notices?

**SPECIAL INTERROGATORY NO. 9**

If YOU ever received any complaints from PLAINTIFF(S) at the PROPERTY that the PROPERTY's manager gave them incorrect notices in the past ten years, please list the notices that were complained of.

**SPECIAL INTERROGATORY NO. 10**

If YOU ever received any complaints from PLAINTIFF(S) at the PROPERTY that the PROPERTY's manager gave them incorrect notices in the past ten years, please list the contents notices that were complained of.

**SPECIAL INTERROGATORY NO. 11**

If YOU ever received any complaints from PLAINTIFF(S) at the PROPERTY that the PROPERTY's manager gave them incorrect notices in the past ten years, please list the dates the notices that were complained of.

**SPECIAL INTERROGATORY NO. 12**

If YOU ever received any complaints from PLAINTIFF(S) at the PROPERTY that the PROPERTY's manager gave them incorrect notices in the past ten years, please state what corrective measure were taken to address the incorrect notices.

**SPECIAL INTERROGATORY NO. 13**

Identify any employees or PERSONS who did maintenance at the PROPERTY since YOU owned or managed the PROPERTY

**SPECIAL INTERROGATORY NO. 14**

Please provide the current address, if known, of any person who performed maintenance at the PROPERTY since YOU owned or managed the PROPERTY.

**SPECIAL INTERROGATORY NO. 15**

Please provide any licenses any person who performed maintenance at the PROPERTY since YOU owned or managed the PROPERTY had.

**SPECIAL INTERROGATORY NO. 16**

Please describe who any maintenance workers who did work at the PROPERTY in the last ten years reported to.

**SPECIAL INTERROGATORY NO. 17**

Please describe the nature of the work any maintenance workers who did work at the PROPERTY in the last ten years DID.

**SPECIAL INTERROGATORY NO. 18**

List all dates any maintenance worker did work at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 19**

For each date listed in the previous interrogatory, please describe the work that person did at the PROPERTY on that date.

**SPECIAL INTERROGATORY NO. 20**

Please provide all payment made to the PERSON described in the previous interrogatory in connection with the PROPERTY?

**SPECIAL INTERROGATORY NO. 21**

Did the PERSON described in the previous interrogatory undergo any training to work on the PROPERTY?

**SPECIAL INTERROGATORY NO. 22**

Did YOU inform the PERSON described in the previous interrogatory of any PROPERTY rules or policies?

**SPECIAL INTERROGATORY NO. 23**

Did any maintenance person(s) that worked at the PROPERTY in the last ten years communicate directly with any PLAINTIFF(S) of the PROPERTY?

**SPECIAL INTERROGATORY NO. 24**

If the maintenance person at the PROPERTY communicated with PLAINTIFF(S) at the PROPERTY directly, please provide dates and describe any communications he/she had.

**SPECIAL INTERROGATORY NO. 25**

Did YOU or anyone acting on YOUR behalf always provide maintenance workers at the PROPERTY with a work order for each job at the PROPERTY over the last ten years?

**SPECIAL INTERROGATORY NO. 26**

IDENTIFY any PERSON(s) who provided maintenance and repair work at the PROPERTY during PLAINTIFFS’ TENANCY.

**SPECIAL INTERROGATORY NO. 27**

For each maintenance PERSON identified in YOUR response to SPECIAL INTERROGATORY NO. 12 above, state the dates of his or her employment.

**SPECIAL INTERROGATORY NO. 28**

For each maintenance PERSON identified in YOUR response to SPECIAL INTERROGATORY NO. 12 above, state the nature of the service performed.

**SPECIAL INTERROGATORY NO. 29**

IDENTIFY all individuals and/or companies that performed work or services of any kind at the PROPERTY during the TENANCY.

**SPECIAL INTERROGATORY NO. 30**

For each individual and/or company identified in YOUR response to SPECIAL INTERROGATORY NO. 15 above, state the dates of their employment.

**SPECIAL INTERROGATORY NO. 31**

For each individual and/or company identified in YOUR response to SPECIAL INTERROGATORY NO. 15 above, state the nature of the service performed.

**SPECIAL INTERROGATORY NO. 32**

IDENTIFY all contractors retained by YOU to perform repairs at the PROPERTY in the last seven years.

**SPECIAL INTERROGATORY NO. 33**

State the schedule of cleaning workers at the PROPERTY in the last 7 years.

**SPECIAL INTERROGATORY NO. 34**

State the schedule of maintenance workers at the PROPERTY.

**SPECIAL INTERROGATORY NO. 35**

State any knowledge YOU have about PLAINTIFF(S) of making repairs at their own expense.

**SPECIAL INTERROGATORY NO. 36**

IDENTIFY all DOCUMENTS relating to the maintenance of the PROPERTY while YOU have owned the PROPERTY, including, but not limited to, written descriptions, maintenance logs, and photographs.

**SPECIAL INTERROGATORY NO. 37**

Describe all methods by which PLAINTIFF(S) could contact request repairs, including additional options when the PROPERTY’S handyman and or manager could not be reached, including, but not limited to, nights and weekends.

**SPECIAL INTERROGATORY NO. 38**

IDENTIFY all DOCUMENTS which concern notice to the PLAINTIFF(S) as to how to contact a repair person when the PROPERTY'S handyman could not be reached, including, but not limited to, nights and weekends.

**SPECIAL INTERROGATORY NO. 39**

For each contractor identified in YOUR response to SPECIAL INTERROGATORY NO. 11, state each date of service.

**SPECIAL INTERROGATORY NO. 40**

For each date of service identified in YOUR response to SPECIAL INTERROGATORY NO. 12, state the work that was done.

**SPECIAL INTERROGATORY NO. 41**

State all dates in which PLAINTIFFS made a request for repairs at the PROPERTY during the TENANCY.

**SPECIAL INTERROGATORY NO. 42**

IDENTIFY all COMMUNICATIONS YOU had with PLAINTIFFS IN CONNECTION WITH requests for repairs at the PROPERTY during their TENANCY(s)

**SPECIAL INTERROGATORY NO. 43**

IDENTIFY all DOCUMENTS PLAINTIFFS sent to YOU CONCERNING requests for repairs at the PROPERTY during the TENANCY.

**SPECIAL INTERROGATORY NO. 44**

IDENTIFY all DOCUMENTS RELATED TO complaints from PLAINTIFFS to YOU about any repairs YOU made at the PROPERTY during the TENANCY.

**SPECIAL INTERROGATORY NO. 45**

Describe any DOCUMENT or other evidence (as defined in Evidence Code §140) which sets forth any and all policies or procedures which YOU OR ANYONE ACTING ON YOUR BEHALF had implemented within the last ten years concerning periodic inspection or maintenance of the SUBJECT PREMISES.

**SPECIAL INTERROGATORY NO. 46**

State if there is a 24-hour emergency number that tenants at the PROPERTY can use to call if there is an emergency at the PROPERTY.

**SPECIAL INTERROGATORY NO. 47**

IDENTIFY the 24-hour emergency number for tenants  to report emergencies at the PROPERTY.

**SPECIAL INTERROGATORY NO. 48**

IDENTIFY who is responsible for answering the 24-hour emergency number for the PROPERTY.

**SPECIAL INTERROGATORY NO. 49**

IDENTIFY where the 24-hour emergency number for the PRPERTY is posted for tenants to see at the PROPERTY.

**SPECIAL INTERROGATORY NO. 50**

Describe any DOCUMENT or other evidence (as defined in Evidence Code §140) which sets forth any and all policies or procedures which for tenants at the PROPERTY to report emergencies at the PROPERTY after business hours.

**SPECIAL INTERROGATORY NO. 51**

State whether the 24-hour emergency number for the PROPERTY has the ability to take/record messages if no one answers the phone.

**SPECIAL INTERROGATORY NO. 52**

State the average response time by YOU to tenant calls at the PROPERTY left after hours on the 24-hour emergency line in the last seven (7) years.

**SPECIAL INTERROGATORY NO. 53**

IDENTIFY all messages left on the 24-hour emergency number for the PROPERTY in the last seven (7) years.

**SPECIAL INTERROGATORY NO. 54**

Describe all messages left on the 24-hour emergency number for the PROPERTY in the last seven (7) years.

**SPECIAL INTERROGATORY NO. 55**

For each message that was left on the 24-hour emergency number for the PROPERTY in the last seven (7) years, state how long after the message was left YOU listened to it.

**SPECIAL INTERROGATORY NO. 56**

For each message that was left on the 24-hour emergency number for the PROPERTY in the last seven (7) years, state how long after the message was left YOU responded to it.

**SPECIAL INTERROGATORY NO. 57**

IDENTIFY all lessees of each rental unit of the PROPERTY since you became the PROPERTY manager at the PROPERTY

**SPECIAL INTERROGATORY NO. 58**

IDENTIFY all lessors of each rental unit of the PROPERTY since you became the PROPERTY manager at the PROPERTY.

**SPECIAL INTERROGATORY NO. 59**

IDENTIFY the person(s) most knowledgeable about the terms and conditions of PLAINTIFFS’ TENANCY at the PROPERTY.

**SPECIAL INTERROGATORY NO. 60**

IDENTIFY all DOCUMENTS RELATING TO PLAINTIFFS’ tenancy at the PROPERTY.

**SPECIAL INTERROGATORY NO. 61**

IDENTIFY all dates in which each PLAINTIFF made monthly rent payments during the TENANCY in the last 8 years.

**SPECIAL INTERROGATORY NO. 62**

IDENTIFY all DOCUMENTS that evidence each of PLAINTIFFS’ monthly rent payments to YOU during each of their TENANCY(s).

**SPECIAL INTERROGATORY NO. 63**

IDENTIFY and DESCRIBE all monetary or non-monetary income or payments of any kind that YOU received RELATED TO the use of the PROPERTY during that time that YOU owned the PROPERTY.

**SPECIAL INTERROGATORY NO. 64**

Other than this action, has any PERSON brought legal action against YOU RELATED TO the PROPERTY?

**SPECIAL INTERROGATORY NO. 65**

If any person has brought legal action against YOU related to the PROPERTY, state the Court case number(s) of each legal action brought against YOU.

**SPECIAL INTERROGATORY NO. 66**

IDENTIFY all PROPERTY managers who have worked at the PROPERTY while YOU were employed by the PROPERTY.

**SPECIAL INTERROGATORY NO. 67**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, state the dates of employment.

**SPECIAL INTERROGATORY NO. 68**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, state the duties of his or her job, including, but not limited to, job title and hours.

**SPECIAL INTERROGATORY NO. 69**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, state the duties of each PERSON’S job, including, but not limited to, job title and hours.

**SPECIAL INTERROGATORY NO. 70**

IDENTIFY all PERSONS who prepared NOTICES from “management” during PLAINTIFF(S)' TENANCY(S).

**SPECIAL INTERROGATORY NO. 71**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, where were they located during their daily employment?

**SPECIAL INTERROGATORY NO. 72**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, who did they report to?

**SPECIAL INTERROGATORY NO. 73**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, state the duties of each PERSON’S job, including, but not limited to, job title and hours.

**SPECIAL INTERROGATORY NO. 74**

For each PROPERTY manager/PROPERTY management company(s) who has worked at the PROPERTY since YOU were associate with the PROPERTY, please state any training they had for their position at the PROPERTY.

**SPECIAL INTERROGATORY NO. 75**

State any agreements between owner/members of company and manager/management company, oral or written

**SPECIAL INTERROGATORY NO. 76**

Does anyone in the PROPERTY's management have an interest in the PROPERTY's ownership?

**SPECIAL INTERROGATORY NO. 77**

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

**SPECIAL INTERROGATORY NO. 78**

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

**SPECIAL INTERROGATORY NO. 79**

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

**SPECIAL INTERROGATORY NO. 80**

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

**SPECIAL INTERROGATORY NO. 81**

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

**SPECIAL INTERROGATORY NO. 82**

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

**SPECIAL INTERROGATORY NO. 83**

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

**SPECIAL INTERROGATORY NO. 84**

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

**SPECIAL INTERROGATORY NO. 85**

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

**SPECIAL INTERROGATORY NO. 86**

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

**SPECIAL INTERROGATORY NO. 87**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding vermin 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. 88**

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

**SPECIAL INTERROGATORY NO. 89**

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

**SPECIAL INTERROGATORY NO. 90**

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

**SPECIAL INTERROGATORY NO. 91**

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

**SPECIAL INTERROGATORY NO. 92**

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

**SPECIAL INTERROGATORY NO. 93**

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

**SPECIAL INTERROGATORY NO. 94**

State whether the DEFENDANTS has ever tested for mold iatn the PROPERTY and, if so, identify the date, method of testing, and results of each test in the last ten years.

**SPECIAL INTERROGATORY NO. 95**

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

**SPECIAL INTERROGATORY NO. 96**

IDENTIFY all maintenance requests made by PLAINTIFF regarding water leaks, plumbing issues, or other conditions that could contribute to mold at the PROPERTY.

**SPECIAL INTERROGATORY NO. 97**

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

**SPECIAL INTERROGATORY NO. 98**

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

**SPECIAL INTERROGATORY NO. 99**

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

**SPECIAL INTERROGATORY NO. 100**

State whether the DEFENDANTS informed PLAINTIFF of any health risks associated with mold at the PROPERTY.

**SPECIAL INTERROGATORY NO. 101**

IDENTIFY all documents provided to PLAINTIFF concerning mold, including prevention, detection, and reporting.

**SPECIAL INTERROGATORY NO. 102**

State whether the DEFENDANTS received any complaints regarding health issues allegedly caused by mold at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 103**

Describe any steps the DEFENDANTS have taken to prevent mold from forming at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 104**

State whether the DEFENDANTS tested the air quality at the PROPERTY and, if so, identify the date, method, and results of such tests in the last ten years.

**SPECIAL INTERROGATORY NO. 105**

IDENTIFY all communications between the DEFENDANT and the PLAINTIFF regarding the presence of mold at the PROPERTY.

**SPECIAL INTERROGATORY NO. 106**

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

**SPECIAL INTERROGATORY NO. 107**

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

**SPECIAL INTERROGATORY NO. 108**

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

**SPECIAL INTERROGATORY NO. 109**

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

**SPECIAL INTERROGATORY NO. 110**

State whether after any remediation efforts in the last ten years, YOU had a licensed mold professional re-test the PROPERTY to ensure that any mold in the unit had been eradicated.

**SPECIAL INTERROGATORY NO. 111**

State whether YOU knew that PLAINTIFF(S) sought medical treatment for mold-related symptoms.

**SPECIAL INTERROGATORY NO. 112**

State whether your mold remediation effort was simpily to paint over the area where mold seemed to be present.

**SPECIAL INTERROGATORY NO. 113**

If the answer to the previous interrogatory is Yes, did the mold come back within six-months after and if so, did you attempt a different type of remediation effort thereafter.

**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)