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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. (6) Six** |

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

Requesting party: **Plaintiff, Clark Kent**

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

Set No.: **Six (6)**

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. 582**

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

**SPECIAL INTERROGATORY NO. 583**

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

**SPECIAL INTERROGATORY NO. 584**

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. 585**

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. 586**

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

**SPECIAL INTERROGATORY NO. 587**

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

**SPECIAL INTERROGATORY NO. 588**

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

**SPECIAL INTERROGATORY NO. 589**

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

**SPECIAL INTERROGATORY NO. 590**

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

**SPECIAL INTERROGATORY NO. 591**

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

**SPECIAL INTERROGATORY NO. 592**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding spiders 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. 593**

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

**SPECIAL INTERROGATORY NO. 594**

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

**SPECIAL INTERROGATORY NO. 595**

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

**SPECIAL INTERROGATORY NO. 596**

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 electrical outlets 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. 597**

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

**SPECIAL INTERROGATORY NO. 598**

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

**SPECIAL INTERROGATORY NO. 599**

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 electrical outlets in PLAINTIFF(S)' UNIT at the PROPERTY, did you ever send a licensed contractor/electrician to address the complaint?

**SPECIAL INTERROGATORY NO. 600**

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

**SPECIAL INTERROGATORY NO. 601**

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

**SPECIAL INTERROGATORY NO. 602**

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

**SPECIAL INTERROGATORY NO. 603**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding the smoke alarm(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. 604**

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

**SPECIAL INTERROGATORY NO. 605**

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

**SPECIAL INTERROGATORY NO. 606**

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

**SPECIAL INTERROGATORY NO. 607**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) smoke alarm(s) issues?

**SPECIAL INTERROGATORY NO. 608**

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

**SPECIAL INTERROGATORY NO. 609**

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

**SPECIAL INTERROGATORY NO. 610**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding insufficient water pressure 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. 611**

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

**SPECIAL INTERROGATORY NO. 612**

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

**SPECIAL INTERROGATORY NO. 613**

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

**SPECIAL INTERROGATORY NO. 614**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) insufficient water pressure?

**SPECIAL INTERROGATORY NO. 615**

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

**SPECIAL INTERROGATORY NO. 616**

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

**SPECIAL INTERROGATORY NO. 617**

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

**SPECIAL INTERROGATORY NO. 618**

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

**SPECIAL INTERROGATORY NO. 619**

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

**SPECIAL INTERROGATORY NO. 620**

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

**SPECIAL INTERROGATORY NO. 621**

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

**SPECIAL INTERROGATORY NO. 622**

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

**SPECIAL INTERROGATORY NO. 623**

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

**SPECIAL INTERROGATORY NO. 624**

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

**SPECIAL INTERROGATORY NO. 625**

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

**SPECIAL INTERROGATORY NO. 626**

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

**SPECIAL INTERROGATORY NO. 627**

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

**SPECIAL INTERROGATORY NO. 628**

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

**SPECIAL INTERROGATORY NO. 629**

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

**SPECIAL INTERROGATORY NO. 630**

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

**SPECIAL INTERROGATORY NO. 631**

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

**SPECIAL INTERROGATORY NO. 632**

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 illegitimate notice(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. 633**

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 illegitimate notice(s) at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 634**

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 illegitimate notice(s) at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 635**

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

**SPECIAL INTERROGATORY NO. 636**

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

**SPECIAL INTERROGATORY NO. 637**

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

**SPECIAL INTERROGATORY NO. 638**

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 aggressive/inappropriate language from 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. 639**

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 aggressive/inappropriate language from DEFENDANT(S) at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 640**

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 aggressive/inappropriate language from DEFENDANT(S) at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 641**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from aggressive/inappropriate language from DEFENDANT(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 642**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from aggressive/inappropriate language from DEFENDANT(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 643**

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

**SPECIAL INTERROGATORY NO. 644**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding unannounced electricity 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. 645**

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

**SPECIAL INTERROGATORY NO. 646**

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

**SPECIAL INTERROGATORY NO. 647**

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

**SPECIAL INTERROGATORY NO. 648**

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

**SPECIAL INTERROGATORY NO. 649**

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

**SPECIAL INTERROGATORY NO. 650**

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

**SPECIAL INTERROGATORY NO. 651**

State any occasion on which YOU or any of YOUR agents arranged for maintenance, remodel or repair work at the PROPERTY that resulted in an unannounced electricity shutoff.

**SPECIAL INTERROGATORY NO. 652**

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

**SPECIAL INTERROGATORY NO. 653**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding unauthorized entries into PLAINTIFF(S)' UNIT(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. 654**

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

**SPECIAL INTERROGATORY NO. 655**

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

**SPECIAL INTERROGATORY NO. 656**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about unauthorized entries into their UNIT(s) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 657**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about unauthorized entries into their UNIT(S) at the PROPERTY?

**SPECIAL INTERROGATORY NO. 658**

Did YOU or anyone acting on YOUR behalf ever enter PLAINTIFF(S)' UNIT at the PROPERTY during their tenancy without proper, written 24-hour notice?

**SPECIAL INTERROGATORY NO. 659**

If YOU or anyone acting on YOUR behalf ever enter PLAINTIFF(S)' UNIT at the PROPERTY during their tenancy without proper, written 24-hour notice, identify the date each such instance

**SPECIAL INTERROGATORY NO. 660**

If YOU or anyone acting on YOUR behalf ever enter PLAINTIFF(S)' UNIT at the PROPERTY during their tenancy without proper, written 24-hour notice, identify the reason for each such instance

**SPECIAL INTERROGATORY NO. 661**

IDENTIFY each person who participated in or influenced the decision to notices to PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 662**

State the date and manner in which each such person first became aware of PLAINTIFF(S)’ disability(s).

**SPECIAL INTERROGATORY NO. 663**

State all reasons YOU contend justify any adverse housing decision regarding PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 664**

IDENTIFY each request for reasonable accommodation made by PLAINTIFF(S), including the date, nature of the request, and YOUR response.

**SPECIAL INTERROGATORY NO. 665**

State all reasons YOU contend justified any denial, delay, or modification of PLAINTIFF(S)’ request for accommodation.

**SPECIAL INTERROGATORY NO. 666**

IDENTIFY each occasion in which YOU granted a reasonable accommodation to a tenant without a disability and denied a similar accommodation to PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 667**

IDENTIFY all tenants without disabilities who were granted housing, lease renewals, repairs, or modifications under similar circumstances as PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 668**

For each such tenant identified in YOUR response to the previous Interrogatory, state the reasons YOU contend explains any difference in treatment compared to PLAINTIFF(S).

**SPECIAL INTERROGATORY NO. 669**

IDENTIFY all tenants with disabilities who have resided at the PROPERTY within the past ten years and state whether they received accommodations.

**SPECIAL INTERROGATORY NO. 670**

IDENTIFY all written or unwritten policies in effect during PLAINTIFF(S)’ tenancy(s) that relate to disability accommodations, modifications, tenant selection, lease renewal, rent increases, or eviction.

**SPECIAL INTERROGATORY NO. 671**

State whether YOU had any training, manuals, or materials provided to employees or agents regarding disability rights or reasonable accommodations, and describe them.

**SPECIAL INTERROGATORY NO. 672**

IDENTIFY all persons responsible for implementing YOUR disability accommodation policies at the PROPERTY.

**SPECIAL INTERROGATORY NO. 673**

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

**SPECIAL INTERROGATORY NO. 674**

State whether YOU or any of YOUR agents have ever made statements about tenants with disabilities being “too costly,” “too difficult,” or otherwise undesirable, and describe each statement.

**SPECIAL INTERROGATORY NO. 675**

IDENTIFY all communications between YOU and any third party (such as PROPERTY managers, HOAs, insurance providers, or lenders) regarding PLAINTIFF(S)’ disability(s).

**SPECIAL INTERROGATORY NO. 676**

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

**SPECIAL INTERROGATORY NO. 677**

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

**SPECIAL INTERROGATORY NO. 678**

State whether YOU have ever been contacted by any government agency regarding alleged disability discrimination in housing, and describe the outcome.

**SPECIAL INTERROGATORY NO. 679**

IDENTIFY all instances in the past ten years where YOU took adverse action against a tenant after they requested a disability-related accommodation, and state the reasons for each.

**SPECIAL INTERROGATORY NO. 680**

State whether YOU have ever considered the presence of a service animal, mobility aid, or other disability-related device in making housing decisions, and if so, describe each instance.

**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)