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**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, TONY STARK‘S, SET NO. (7) Seven** |

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Requesting party: **Plaintiff, Clark Kent**

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

Set No.: **Seven (7)**

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. 700**

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

**SPECIAL INTERROGATORY NO. 701**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding window leak(s) 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. 702**

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

**SPECIAL INTERROGATORY NO. 703**

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

**SPECIAL INTERROGATORY NO. 704**

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

**SPECIAL INTERROGATORY NO. 705**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) window leak(s)?

**SPECIAL INTERROGATORY NO. 706**

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

**SPECIAL INTERROGATORY NO. 707**

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

**SPECIAL INTERROGATORY NO. 708**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding water/insect intrusion through the door(s) 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. 709**

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

**SPECIAL INTERROGATORY NO. 710**

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

**SPECIAL INTERROGATORY NO. 711**

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

**SPECIAL INTERROGATORY NO. 712**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) water/insect intrusion through the door(s)?

**SPECIAL INTERROGATORY NO. 713**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their water/insect intrusion through the door(s) issues at the PROPERTY?

**SPECIAL INTERROGATORY NO. 714**

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

**SPECIAL INTERROGATORY NO. 715**

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) in 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. 716**

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

**SPECIAL INTERROGATORY NO. 717**

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) in the ceiling in PLAINTIFF(S) UNIT at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to those complaints regarding a  hole(s) in the ceiling in PLAINTIFF(S) UNIT at the PROPERTY?

**SPECIAL INTERROGATORY NO. 718**

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

**SPECIAL INTERROGATORY NO. 719**

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

**SPECIAL INTERROGATORY NO. 720**

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

**SPECIAL INTERROGATORY NO. 721**

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

**SPECIAL INTERROGATORY NO. 722**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding the basement flood(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. 723**

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

**SPECIAL INTERROGATORY NO. 724**

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

**SPECIAL INTERROGATORY NO. 725**

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

**SPECIAL INTERROGATORY NO. 726**

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

**SPECIAL INTERROGATORY NO. 727**

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

**SPECIAL INTERROGATORY NO. 728**

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

**SPECIAL INTERROGATORY NO. 729**

If YOU OR ANYONE ACTING ON YOUR BEHALF had become aware of any complaints from PLAINTIFF(S) in the past ten years regarding the flooding 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. 730**

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

**SPECIAL INTERROGATORY NO. 731**

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

**SPECIAL INTERROGATORY NO. 732**

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

**SPECIAL INTERROGATORY NO. 733**

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

**SPECIAL INTERROGATORY NO. 734**

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

**SPECIAL INTERROGATORY NO. 735**

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

**SPECIAL INTERROGATORY NO. 736**

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

**SPECIAL INTERROGATORY NO. 737**

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

**SPECIAL INTERROGATORY NO. 738**

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

**SPECIAL INTERROGATORY NO. 739**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S) complaints about drug use at the PROPERTY?

**SPECIAL INTERROGATORY NO. 740**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about drug use at the PROPERTY?

**SPECIAL INTERROGATORY NO. 741**

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

**SPECIAL INTERROGATORY NO. 742**

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

**SPECIAL INTERROGATORY NO. 743**

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

**SPECIAL INTERROGATORY NO. 744**

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

**SPECIAL INTERROGATORY NO. 745**

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

**SPECIAL INTERROGATORY NO. 746**

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

**SPECIAL INTERROGATORY NO. 747**

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

**SPECIAL INTERROGATORY NO. 748**

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

**SPECIAL INTERROGATORY NO. 749**

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

**SPECIAL INTERROGATORY NO. 750**

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

**SPECIAL INTERROGATORY NO. 751**

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

**SPECIAL INTERROGATORY NO. 752**

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

**SPECIAL INTERROGATORY NO. 753**

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

**SPECIAL INTERROGATORY NO. 754**

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

**SPECIAL INTERROGATORY NO. 755**

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

**SPECIAL INTERROGATORY NO. 756**

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

**SPECIAL INTERROGATORY NO. 757**

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 written threats 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. 758**

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 written threats from DEFENDANT(S)' at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 759**

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 written threats from DEFENDANT(S)' at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 760**

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

**SPECIAL INTERROGATORY NO. 761**

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

**SPECIAL INTERROGATORY NO. 762**

Within the past ten years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints from PLAINTIFF(S) regarding harassment from notices singling out one tenant or group of tenants at the PROPERTY?

**SPECIAL INTERROGATORY NO. 763**

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 notices singling out one tenant or group of tenants at the PROPERTY, identify each such complaint (including the date of the complaint and the nature of the situation complained of).

**SPECIAL INTERROGATORY NO. 764**

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 notices singling out one tenant or group of tenants at the PROPERTY, IDENTIFY what corrective measure YOU took to address the complaint?

**SPECIAL INTERROGATORY NO. 765**

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 notices singling out one tenant or group of tenants at the PROPERTY, IDENTIFY all DOCUMENTS RELATED to complaints from PLAINTIFF(S)

**SPECIAL INTERROGATORY NO. 766**

Did YOU ever increase PLAINTIFF(S)’ rent at the PROPERTY despite PLAINTIFF(S)' complaints about harassment from notices singling out one tenant or group of tenants at the PROPERTY?

**SPECIAL INTERROGATORY NO. 767**

Did YOU ever reduce PLAINTIFF(S)’ rent at the PROPERTY to compensate PLAINTIFF(S) for their complaints about harassment from notices singling out one tenant or group of tenants at the PROPERTY?

**SPECIAL INTERROGATORY NO. 768**

IDENTIFY each type of notice (ie. 3-day, entry, 30-day, 60-day) you provided to PLAINTIFF(S) at the PROPERTY in the last ten years.

**SPECIAL INTERROGATORY NO. 769**

Did you issue notices informally to all PLAINTIFF(S) at the PROPERTY in the last ten years or were certain PLAINTIFF(S) given greater leeway in certain situations (such as additional days to pay late rent).

**SPECIAL INTERROGATORY NO. 770**

Did you ever accept rent late from a PLAINTIF(S) at the PROPERTY in the last ten years without providing them a notice after rent was due, but before rent was actually paid.

**SPECIAL INTERROGATORY NO. 771**

Were you consistent in the time frame you provided notices to PLAINTIFF(S) at the PROPERTY in the last ten years (ie. 3-day notices to pay rent on the fifth of every month)?

**SPECIAL INTERROGATORY NO. 772**

Are you aware if management ever provided PLAINTIFF(S) at the PROPERTY in the last ten years a notice to harass the PLAINTIFF(S)?

**SPECIAL INTERROGATORY NO. 773**

In the last ten years, did you ever provide PLAINTIFF(S) at the PROPERTY a notice to enter their UNIT for repairs and YOU or YOUR repair workers did not show up at the time referenced in the notice?

**SPECIAL INTERROGATORY NO. 774**

State the dates any NOTICES were given to PLAINTIFFS in the last seven years.

**SPECIAL INTERROGATORY NO. 775**

State the reason(s) why each NOTICE was given to PLAINTIFFS in the last seven years.

**SPECIAL INTERROGATORY NO. 776**

DESCRIBE the nature of each NOTICE that was given to PLAINTIFFS in the last seven years.

**SPECIAL INTERROGATORY NO. 777**

IDENTIFY all DOCUMENTS IN CONNECTION with NOTICES YOU gave to PLAINTIFFS during the TENANCY(S).

**SPECIAL INTERROGATORY NO. 778**

Within the past seven years, have YOU OR ANYONE ACTING ON YOUR BEHALF become aware of any complaints regarding incorrect notices issued to the PLAINTIFF(S) at the SUBJECT PREMISES?

**SPECIAL INTERROGATORY NO. 779**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding incorrect notices issued on the PLAINTIFF(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. 780**

If YOU OR ANYONE ACTING ON YOUR BEHALF became aware of any complaint within the last seven years regarding incorrect notices issued on the PLAINTIFF(S) at the PROPERTY, IDENTIFY each and every PERSON who made the complaint.

**SPECIAL INTERROGATORY NO. 781**

IDENTIFY all DOCUMENTS RELATED TO incorrect notices issued on the PLAINTIFF(S) at the PROPERTY during the past 7 years.

**SPECIAL INTERROGATORY NO. 782**

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. 783**

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. 784**

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. 785**

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. 786**

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. 787**

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

**SPECIAL INTERROGATORY NO. 788**

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. 789**

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. 790**

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. 791**

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

**SPECIAL INTERROGATORY NO. 792**

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

**SPECIAL INTERROGATORY NO. 793**

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

**SPECIAL INTERROGATORY NO. 794**

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. 795**

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

**SPECIAL INTERROGATORY NO. 796**

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

**SPECIAL INTERROGATORY NO. 797**

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. 798**

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. 799**

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. 800**

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. 801**

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. 802**

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. 803**

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. 804**

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. 805**

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. 806**

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. 807**

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. 808**

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. 809**

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. 810**

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. 811**

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)