Kevin Lipton, Esq. SBN #291739

Lipton Legal Group, APC

9478 W. Olympic Blvd. Suite #308

Beverly Hills, California 90212

Tel: (310) 855-7556

Fax: (310) 788-3840

Email: Kevin@LiptonLegal.com

Attorney for Plaintiff:

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF – CENTRAL DISTRICT**

|  |  |
| --- | --- |
| **CLARK KENT, INDIVIDUAL**  **vs.**  **and DOES 1 to 25, inclusive**  **Defendants.** | **Case No.**  **PLAINTIFF CLARK KENT‘S REQUEST FOR SPECIAL INTERROGATORIES TO DEFENDANTS, ASFD AFDS‘S, SET NO. (1) One** |

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

Requesting party: **Plaintiff, Clark Kent**

Responding party: **Defendant(s),** **asfd afds**

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

TO DEFENDANT(S) ASFD AFDS AND THEIR ATTORNEYS OF RECORD (IF OBTAINED):

Plaintiff requests that Defendant(s), asfd afds, 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) asfd afds, 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), ASFD AFDS.
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?

**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)