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9 Alessio Faccin, et al.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

ALESSIO FACCIN, ET AL.,

Plaintiffs,

vs.

PACIFIC CENTURY HOMES, INC., ET AL.;
AND DOES 1-1000, INCLUSIVE,

Defendants.

CASE NO.: ECU09044

**PLAINTIFF(S) CARLOS & MARGARET
MATURINO'S RESPONSES TO SPECIAL
INTERROGATORIES**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PROPOUNDING PARTY: DEFENDANT PACIFIC CENTURY HOMES, INC.

RESPONDING PARTY: PLAINTIFF(S) CARLOS & MARGARET MATURINO

SET NUMBER: ONE

Pursuant to *Code of Civil Procedure* Section 2030.010, et seq. Plaintiff(s) Maturino, Carlos & Margaret hereby responds to Special Interrogatories, Set No. One propounded by Defendant, Pacific Century Homes, Inc., as follows:

Since discovery is ongoing, Plaintiff(s) respond to these interrogatories based on information presently available to them and the responses may be supplemented, changed, amended or withdrawn based on the discovery of new facts, evidence, data or information or based on a more complete and thorough understanding of existing facts, evidence, data or information.

1 interrogatory to the extent that said request seeks such communications and/or work product. The
2 waiver of a privilege with respect to any single communication or document shall not be construed
3 to be a waiver of any other privilege.

4 Plaintiff objects to each Interrogatory to the extent that it seeks to impose on Plaintiff any
5 obligation beyond those required by the California Code of Civil Procedure or the local rules of this
6 Court and on the grounds that the interrogatories are neither relevant to this action, nor likely to lead
7 to the discovery of relevant evidence. Plaintiffs also object to each and every one of the Special
8 Interrogatories herein to the extent they seek information which is mediation protected pursuant to
9 Evidence Code 1119 and 1152, et seq.

10 Plaintiff objects and responds on the basis of Defendant's understanding and interpretation
11 of each Interrogatory. If Plaintiff understands or interprets any of the Interrogatories differently,
12 Plaintiff reserves the right to supplement any of these responses, either with additional objections or
13 otherwise.

14 Plaintiff hereby incorporates the Preliminary Statement and General Objections into each of
15 the following specific responses to the Interrogatories.

16 **SPECIAL INTERROGATORY NO. 1:**

17 State the name, address telephone number, and relationship to YOU of each PERSON
18 who prepared or assisted in the preparation of the responses to these interrogatories.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

20 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.
21 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
22 documents and a reasonable and good faith effort to obtain the information by inquiry to other
23 natural persons or organizations, except where the information is equally available to the
24 propounding party, Plaintiff responds as follows: Joseph Su, Esq. of Milstein Jackson Fairchild &
25 Wade, LLP, 10250 Constellation Boulevard, 14th Floor, Los Angeles, CA 90067 Telephone: (310)
26 396-9600, counsel of record in this action.

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1 **SPECIAL INTERROGATORY NO. 2:**

2 State:

3 (a) YOUR name;

4 (b) Every name YOU have used in the past; and

5 (c) The dates YOU used each name;

6 (d) The date and place of YOUR birth.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

8 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.

9 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
10 documents and a reasonable and good faith effort to obtain the information by inquiry to other
11 natural persons or organizations, except where the information is equally available to the
12 propounding party, Plaintiff responds as follows:

13 (a) Carlos E. Maturino;

14 (b) not applicable;

15 (c) I do not recall;

16 (d) 5/11/75 Salinas, California.

17 **SPECIAL INTERROGATORY NO. 3:**

18 State:

19 (a) YOUR present address;

20 (b) YOUR residence address for the past five years;

21 (c) The dates YOU lived at each address.

22 **RESPONSE TO SPECIAL INTERROGATORY NO.3:**

23 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.

24 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
25 documents and a reasonable and good faith effort to obtain the information by inquiry to other
26 natural persons or organizations, except where the information is equally available to the
27 propounding party, Plaintiff responds as follows: (a) 1147 Goldfield Way, Heber, CA 92249;

28 (b) 147 Goldfield Way, Heber, CA 92249;

1 (c) From 02/2010 to present.

2 **SPECIAL INTERROGATORY NO. 4:**

3 With respect to the SUBJECT PROPERTY, state:

4 (a) The address of the SUBJECT PROPERTY;

5 (b) The date YOU received title to the SUBJECT PROPERTY;

6 (c) The name of the PERSON/entity who transferred the SUBJECT PROPERTY to
7 YOU;

8 (d) With respect to title to the SUBJECT PROPERTY, identify all PERSONS,
9 including YOURSELF, who have ever been named on the title while YOU had an ownership
10 interest in SUBJECT PROPERTY and the dates of such appearance on the title;

11 (e) With respect to the SUBJECT PROPERTY, identify all lenders and lien holders who
12 have ever had an interest in the SUBJECT PROPERTY while YOU had an ownership interest in
13 SUBJECT PROPERTY and the dates of such lender or lien holder interest;

14 (f) With respect to the SUBJECT PROPERTY, state all assignments of rights that now, or
15 have ever, affected YOUR ownership interest in the claims being made in this lawsuit.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

17 Objection. This interrogatory seeks information that is equally available to the propounding
18 party and is therefore oppressive, burdensome and ambiguous. Panzalas v. Superior Court (1969)
19 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
20 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
21 “transferred,” and “assignment of right,” and fails to restrict the scope of the interrogatory to
22 information relevant to the subject of the Action. It also improperly seeks information that is
23 protected by the attorney work-product privilege pursuant to Code of Civil Procedure §2018. This
24 interrogatory seeks expert opinion and analysis and calls for a legal conclusion that is beyond the
25 expertise or knowledge of the responding party. Subject to the foregoing, and after conducting a
26 reasonable and good faith effort to search for documents and a reasonable and good faith effort to
27 obtain the information by inquiry to other natural persons or organizations, except where the
28 information is equally available to the propounding party, Plaintiff responds to this interrogatory

1 individually as follows:

2 (a) 1147 Goldfield Way, Heber, CA 92249;

3 (b) On or about 2/2010;

4 (c) I do not recall;

5 (d) Carlos E. Maturino;

6 (e) I do not recall;

7 (f) I don't know.

8 **SPECIAL INTERROGATORY NO. 5:**

9 Have YOU made any claims under any insurance policies or warranty policies for any
10 problems, DEFECTS, or DAMAGES related to the SUBJECT PROPERTY? If so, state:

11 (a) What date was the claim made;

12 (b) To whom the claim as made;

13 (c) Whether the claim was accepted or rejected;

14 (d) The nature of the claim;

15 (e) The IDENTITY of the insurer and policy number for each claim that was made.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

17 Objection. This interrogatory seeks information that is equally available and even more
18 readily accessible to the propounding party, and is therefore oppressive and burdensome. Panzalas
19 v. Superior Court (1969) 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This
20 interrogatory impermissibly assumes facts not in evidence. Furthermore, it is also vague,
21 ambiguous and overbroad with regard to what is meant by the terms "submitted," "claim,"
22 "homeowner's warranty," and "homeowners insurance," and fails to restrict the scope of the
23 interrogatory to information relevant to the subject of the Action. Subject to the foregoing, and
24 after conducting a reasonable and good faith effort to search for documents and a reasonable and
25 good faith effort to obtain the information by inquiry to other natural persons or organizations,
26 except where the information is equally available to the propounding party, Plaintiff responds to this
27 interrogatory individually as follows: Yes.

28 (a) I don not recall. On or about 5/2017;

- 1 (b) American Home Shield;
- 2 (c) Accepted;
- 3 (d) Air Conditioner;
- 4 (e) American Home Shield.

5 **SPECIAL INTERROGATORY NO. 6:**

6 As to any problems, DEFECTS, or DAMAGES that YOU may claim exist at the
7 SUBJECT PROPERTY, have YOU attempted to repair or have YOU repaired any of these
8 problems, DEFECTS or DAMAGES)? If yes, for each such repair, state

- 9 (a) The problem, DEFECT, or DAMAGE that was repaired or attempted to be
10 repaired;
- 11 (b) IDENTIFY who repaired or attempted to repair the problem, DEFECT, or
12 DAMAGE;
- 13 (c) The date(s) the attempt to repair or repair was made and completed; and
14 (d) The cost of repair.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

16 Objection. This interrogatory seeks information that is equally available and readily
17 accessible to the propounding party, and is further available within the pleadings and other
18 documents and discovery already available to the Parties in this matter, as well as readily available
19 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
20 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This interrogatory is vague,
21 ambiguous and overbroad with regard to what is meant by the terms “defect,” “damage,” and
22 “repair,” and fails to restrict the scope of the interrogatory to information relevant to the subject of
23 the Action. Plaintiffs further object on the grounds that this interrogatory seeks premature expert
24 discovery, as to what constitutes construction deficiencies in the real property at issue in this action
25 and to what extent and degree any such construction deficiencies are present. This interrogatory
26 seeks expert opinion and analysis, lacks foundation and calls for a legal conclusion that is beyond
27 the expertise or knowledge of the responding party. Plaintiffs do not have the expertise and therefor
28 is unable to make a determination as to what constitutes a construction deficiency, repair or

1 “condition” with the subject property or what if any repairs are successful. Plaintiffs’ counsel has
2 retained consultants to investigate the construction deficiencies in our home and to create a Defect
3 List and Cost of Repair Report as well as to provide repair recommendations regarding those
4 defects identified. (Please refer to Plaintiffs’ Defect List and Cost of Repair, which will be
5 deposited per the Court’s Case Management Order at the Depository specified therein.) Subject to
6 the foregoing, and after conducting a reasonable and good faith effort to search for documents and a
7 reasonable and good faith effort to obtain the information by inquiry to other natural persons or
8 organizations, except where the information is equally available to the propounding party, Plaintiff
9 responds as follows: Yes.

10 (a) Attempted repair: Air conditioner, electric wiring, plumbing;

11 (b) I do not recall company;

12 (c) On or about 05/2017. Throughout the years, numerous repairs have been made;

13 (d) American Home Shield Insurance. \$100 Deductible. Home warranty.

14 **SPECIAL INTERROGATORY NO. 7:**

15 With respect to any problems, DEFECTS, or DAMAGE YOU claim exists at the
16 SUBJECT PROPERTY in the lawsuit have YOU ever had a professional contractor or engineer,
17 except those hired through YOUR attorney, inspect the problems, DEFECTS, or DAMAGE? If
18 yes, then for each such professional provide:

19 (a) The date(s) of the inspection(s);

20 (b) The IDENTITY of the individual and/or company inspecting the problems,
21 DEFECTS, or DAMAGE;

22 (c) The general nature of the problems, DEFECTS, or DAMAGE inspected;

23 (d) The cost of inspection.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

25 Objection. This interrogatory seeks information that is equally available and even more
26 readily accessible to the propounding party, and is readily available in public record, and is
27 therefore oppressive and burdensome. Panzalas v. Superior Court (1969) 272 Cal.App.2d 499;
28 Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this interrogatory is vague,

1 ambiguous and overbroad with regard to what is meant by the terms "professional contractor"
2 "inspection", "defect", and "damage ". Subject to the foregoing, and after conducting a reasonable
3 and good faith effort to search for documents and a reasonable and good faith effort to obtain the
4 information by inquiry to other natural persons or organizations, except where the information is
5 equally available to the propounding party, Plaintiff responds as follows: No.

6 (a) Not applicable;

7 (b) Not applicable;

8 (c) Not applicable;

9 (d) Not applicable.

10 **SPECIAL INTERROGATORY NO. 8:**

11 With respect to the SUBJECT PROPERTY at issue in this lawsuit state/IDENTIFY:

12 (a) All changes, modifications, or additions that YOU have caused to be made to the
13 SUBJECT PROPERTY;

14 (b) All design professionals and contractors who, in any way, contributed to the
15 above identified changes, modifications, or additions.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

17 Objection. This interrogatory is objected to on the grounds that it is overbroad, indefinite as
18 to time, is without reasonable limitation in its scope, and is burdensome and oppressive, and that it
19 calls for expert opinion or analysis that is beyond the expertise or knowledge of the responding
20 party. This interrogatory is objected to on the grounds that it is vague, ambiguous and overly broad
21 in the use of the terms "state," "modifications," "additions," "changes," and "made," and fails to
22 restrict the scope of the interrogatory to information relevant to the subject of the Action. This
23 interrogatory improperly seeks information that is protected by the attorney work-product privilege
24 pursuant to Code of Civil Procedure §§ 2018.010 et seq. This interrogatory seeks information that
25 is equally available and accessible to the propounding party, as well as readily available in public
26 record, and is therefore oppressive, burdensome and ambiguous. Panzalas v. Superior Court (1969)
27 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Subject to the foregoing, and
28 after conducting a reasonable and good faith effort to search for documents and a reasonable and

1 good faith effort to obtain the information by inquiry to other natural persons or organizations,
2 except where the information is equally available to the propounding party, Plaintiff responds to this
3 interrogatory individually as follows: None made.

4 (a) Not applicable;

5 (b) Not applicable.

6 **SPECIAL INTERROGATORY NO. 9:**

7 State the date upon which YOU retained the law firm and/or attorney representing YOU in
8 his litigation.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

10 Objection. Plaintiff objects to the extent that this interrogatory requests information
11 protected by the attorney work product privilege. Subject to the foregoing, and after conducting a
12 reasonable and good faith effort to search for documents and a reasonable and good faith effort to
13 obtain the information by inquiry to other natural persons or organizations, except where the
14 information is equally available to the propounding party, Plaintiff responds as follows: We do not
15 recall.

16 **SPECIAL INTERROGATORY NO. 10:**

17 With respect to the SUBJECT PROPERTY, state:

18 (a) Whether YOU are the current owner of the SUBJECT PROPERTY;

19 (b) If YOU are not the current owner of the SUBJECT PROPERTY, IDENTIFY the
20 PERSON/entity to whom YOU transferred YOUR ownership interest in the SUBJECT
21 PROPERTY;

22 (c) If YOU are not the current owner of the SUBJECT PROPERTY, state the date upon
23 which YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to a
24 subsequent owner;

25 (d) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to
26 another PERSON/entity, state how much YOU were paid for YOUR ownership interest in the
27 SUBJECT PROPERTY;

28 (e) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to

1 another PERSON/entity, IDENTIFY all real estate agencies, brokers, and sales persons who
2 were in any way involved in the transfer of YOUR ownership interest to such other
3 PERSON/entity;

4 (f) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to
5 another PERSON/entity, IDENTIFY all escrow companies and officers who were in any way
6 involved in the transfer of YOUR ownership interest to such other PERSON/entity.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

8 Objection. This interrogatory seeks information that is equally available and even more
9 readily accessible to the propounding party, and is further available within the pleadings and other
10 documents and discovery already available to the Parties in this matter, as well as readily available
11 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
12 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
13 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
14 “owners.” Subject to the foregoing, and after conducting a reasonable and good faith effort to
15 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
16 other natural persons or organizations, except where the information is equally available to the
17 propounding party, Plaintiff responds as follows:

18 (a) I am the owner.

19 (b) Not applicable;

20 (c) Not applicable;

21 (d) Not applicable;

22 (e) Not applicable;

23 (f) Not applicable.

24 **SPECIAL INTERROGATORY NO. 11:**

25 If YOU are a former owner of the SUBJECT PROPERTY:

26 (a) Did YOU disclose the fact that the SUBJECT PROPERTY was the subject of
27 pending litigation when YOU transferred YOUR interest in the SUBJECT PROPERTY?

28 (b) If YOU disclosed the pending litigation when YOU transferred YOUR ownership

1 interest in the SUBJECT PROPERTY to another PERSON/entity, IDENTIFY all PERSONS to
2 whom YOU made that disclosure;

3 (c) IDENTIFY all DOCUMENTS that relate in any way to YOUR transfer of YOUR
4 ownership interest in the SUBJECT PROPERTY to another PERSON/entity;(d) IDENTIFY all
5 DOCUMENTS that relate in any way to YOUR disclosure of the pending litigation to the
6 PERSON/entity to whom YOU transferred YOUR ownership interest in the SUBJECT
7 PROPERTY;

8 (e) IDENTIFY all DOCUMENTS that YOU disclosed to the PERSON/entity to whom
9 YOU transferred YOUR ownership interest in the SUBJECT PROPERTY that describe any
10 DEFECTS that YOU believed existed in the SUBJECT PROPERTY at the time that YOU
11 transferred YOUR ownership interest;

12 (f) If YOUR disclosure of DEFECTS that YOU believed existed in the SUBJECT
13 PROPERTY at the time YOU transferred YOUR ownership interest was not in writing, state the
14 DEFECTS that YOU otherwise disclosed.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

16 Objection. This interrogatory seeks information that is equally available and even more
17 readily accessible to the propounding party, and is further available within the pleadings and other
18 documents and discovery already available to the Parties in this matter, as well as readily available
19 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
20 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
21 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
22 “owners.” Subject to the foregoing, and after conducting a reasonable and good faith effort to
23 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
24 other natural persons or organizations, except where the information is equally available to the
25 propounding party, Plaintiff responds as follows:

26 (a) Not applicable;

27 (b) Not applicable;

28 (c) Not applicable;

1 (d) Not applicable;

2 (e) Not applicable;

3 (f) Not applicable.

4 **SPECIAL INTERROGATORY NO. 12:**

5 If YOU are a former owner of the SUBJECT PROPERTY:

6 (a) Did the PERSON/entity to whom YOU transferred YOUR ownership interest in the
7 SUBJECT PROPERTY ask YOU to repair any problems, DEFECTS, or DAMAGES that he/she/it
8 believed existed at the SUBJECT PROPERTY;

9 (b) If YOUR response to subpart (a) above is "yes" state the repairs that were
10 requested by the PERSON/entity to whom YOU transferred YOUR ownership interest;

11 (c) Was YOUR transfer of YOUR ownership interest in the SUBJECT PROPERTY
12 conditioned upon YOUR repair of any problems, DEFECTS, or DAMAGES that YOU disclosed at
13 the SUBJECT PROPERTY?

14 (d) If YOUR response to subpart (c) above is "yes", state the repairs that the
15 PERSON/entity to whom YOU transferred YOUR ownership interest required that YOU make to
16 the SUBJECT PROPERTY.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

18 Objection. This interrogatory seeks information that is equally available and even more
19 readily accessible to the propounding party, and is further available within the pleadings and other
20 documents and discovery already available to the Parties in this matter, as well as readily available
21 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
22 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
23 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
24 "owners." Subject to the foregoing, and after conducting a reasonable and good faith effort to
25 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
26 other natural persons or organizations, except where the information is equally available to the
27 propounding party, Plaintiff responds as follows:

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- (a) No
- (b) Not applicable;
- (c) Not applicable.

SPECIAL INTERROGATORY NO. 13:

During the time of ownership, was there in effect any policy of insurance through which YOU were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for damages, claims, or actions that have arisen out of the issues in the case? If so, for each policy state

- (a) The kind of Coverage;
- (b) The name of the Insurance Company;
- (c) Full Name of each Insured.
- (d) The Policy Number.

RESPONSE TO SPECIAL INTERROGATORY NO. 13:

Objection. This interrogatory seeks information that is equally available and even more readily accessible to the propounding party, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969) 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This interrogatory impermissibly assumes facts not in evidence. Furthermore, it is also vague, ambiguous and overbroad with regard to what is meant by the terms “insured,” “made a claim,” and “claim,” and fails to restrict the scope of the interrogatory to information relevant to the subject of the Action. Subject to the foregoing, and after conducting a reasonable and good faith effort to search for documents and a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to the propounding party, Plaintiff responds to this interrogatory individually as follows:

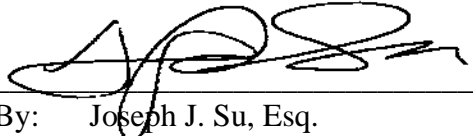
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- (a) Not applicable;
- (b) Not applicable;
- (c) Not applicable;
- (d) Not applicable;

DATED: December 4, 2017

MILSTEIN JACKSON FAIRCHILD & WADE, LLP


By: Joseph J. Su, Esq.
Attorney for Plaintiffs,
Alessio Faccin, et al.

Carlos & Margaret Maturino
1147 Goldfield Way
Heber CA 92249

SPECIAL INTERROGATORIES VERIFICATION

Alessio Faccin, et al. v. Pacific Century Homes, Inc., et al.

Case No.: ECU09044

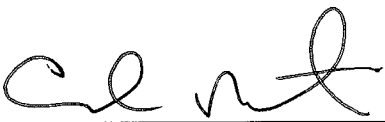
I am a party to this action. The matters stated in the foregoing **RESPONSE TO SPECIAL INTERROGATORIES TO PLAINTIFF(S)** are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 18, 2017, at **Heber**, California.
(date)


1st Owner:

Carlos E. Maturino
Name


Signature

2nd Owner (if any):

Margaret Maturino
Name


Signature

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

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2 These responses are made solely for the purpose of, and in relation to, this action. Each
3 response is given subject to all appropriate objections (including, but not limited to, objections
4 concerning competency, relevancy, materiality, propriety, and admissibility) which would require
5 exclusion of any statement contained herein if the interrogatory were asked of, or any statement
6 contained herein were made by, a witness present and testifying in court. All such objections and
7 grounds therefore are reserved and may be interposed at time of trial.

8 The party on whose behalf the responses are given has not yet completed his, her or its
9 investigation of the facts relating to this action, has not yet completed discovery in this action, and
10 has not yet completed preparation for trial. Consequently, the following responses are given
11 without prejudice to the responding party's right to produce at trial subsequently discovered
12 material and to supplement these responses as discovery continues and the information becomes
13 known.

14 The Plaintiffs in this matter have been requested to provide deposition testimony which will
15 duplicate the interrogatories contained herein, making it unduly burdensome and oppressive to
16 provide responses in a duplicative manner. In order to avoid the necessity of repeating the objection
17 with respect to every interrogatory, the responding party hereby formally and specifically objects to
18 each and every interrogatory to the extent that it requests information already provided either
19 through production of documents or deposition testimony.

20 Except for facts explicitly admitted herein, no admission of any nature is to be implied or
21 inferred. The fact that any interrogatory herein has been answered should not be taken as an
22 admission, or a concession, of the existence of any facts set forth or assumed by such interrogatory,
23 or that such answer constitutes evidence of any fact thus set forth or assumed. All responses must
24 be construed as given on the basis of present recollection.

25 The responses given herein are based on the responding party's understanding that none of
26 the interrogatories seek the revelation of communications between attorney and client and/or the
27 work product of counsel. In order to avoid the necessity of repeating the objection with respect to
28 every interrogatory, the responding party hereby formally and specifically objects to each and every

1 interrogatory to the extent that said request seeks such communications and/or work product. The
2 waiver of a privilege with respect to any single communication or document shall not be construed
3 to be a waiver of any other privilege.

4 Plaintiff objects to each Interrogatory to the extent that it seeks to impose on Plaintiff any
5 obligation beyond those required by the California Code of Civil Procedure or the local rules of this
6 Court and on the grounds that the interrogatories are neither relevant to this action, nor likely to lead
7 to the discovery of relevant evidence. Plaintiffs also object to each and every one of the Special
8 Interrogatories herein to the extent they seek information which is mediation protected pursuant to
9 Evidence Code 1119 and 1152, et seq.

10 Plaintiff objects and responds on the basis of Defendant's understanding and interpretation
11 of each Interrogatory. If Plaintiff understands or interprets any of the Interrogatories differently,
12 Plaintiff reserves the right to supplement any of these responses, either with additional objections or
13 otherwise.

14 Plaintiff hereby incorporates the Preliminary Statement and General Objections into each of
15 the following specific responses to the Interrogatories.

16 **SPECIAL INTERROGATORY NO. 1:**

17 State the name, address telephone number, and relationship to YOU of each PERSON
18 who prepared or assisted in the preparation of the responses to these interrogatories.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

20 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.
21 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
22 documents and a reasonable and good faith effort to obtain the information by inquiry to other
23 natural persons or organizations, except where the information is equally available to the
24 propounding party, Plaintiff responds as follows: Joseph Su, Esq. of Milstein Jackson Fairchild &
25 Wade, LLP, 10250 Constellation Boulevard, 14th Floor, Los Angeles, CA 90067 Telephone: (310)
26 396-9600, counsel of record in this action.

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1 **SPECIAL INTERROGATORY NO. 2:**

2 State:

3 (a) YOUR name;

4 (b) Every name YOU have used in the past; and

5 (c) The dates YOU used each name;

6 (d) The date and place of YOUR birth.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

8 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.

9 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
10 documents and a reasonable and good faith effort to obtain the information by inquiry to other
11 natural persons or organizations, except where the information is equally available to the
12 propounding party, Plaintiff responds as follows:

13 (a) Christopher Carlon.

14 (b) None.

15 (c) Since birth (1974).

16 (d) 05-05-74 Calexico, CA.

17 **SPECIAL INTERROGATORY NO. 3:**

18 State:

19 (a) YOUR present address;

20 (b) YOUR residence address for the past five years;

21 (c) The dates YOU lived at each address.

22 **RESPONSE TO SPECIAL INTERROGATORY NO.3:**

23 Plaintiff incorporates by reference the Preliminary Statement and General Objections above.

24 Subject to the foregoing, and after conducting a reasonable and good faith effort to search for
25 documents and a reasonable and good faith effort to obtain the information by inquiry to other
26 natural persons or organizations, except where the information is equally available to the
27 propounding party, Plaintiff responds as follows:

28 (a) 1152 Bloomfield St. Heber CA 92249;

1 (b) 1152 Bloomfield St. Heber CA 92249;

2 (c) March 22, 2012.

3 **SPECIAL INTERROGATORY NO. 4:**

4 With respect to the SUBJECT PROPERTY, state:

5 (a) The address of the SUBJECT PROPERTY;

6 (b) The date YOU received title to the SUBJECT PROPERTY;

7 (c) The name of the PERSON/entity who transferred the SUBJECT PROPERTY to
8 YOU;

9 (d) With respect to title to the SUBJECT PROPERTY, identify all PERSONS,
10 including YOURSELF, who have ever been named on the title while YOU had an ownership
11 interest in SUBJECT PROPERTY and the dates of such appearance on the title;

12 (e) With respect to the SUBJECT PROPERTY, identify all lenders and lien holders who
13 have ever had an interest in the SUBJECT PROPERTY while YOU had an ownership interest in
14 SUBJECT PROPERTY and the dates of such lender or lien holder interest;

15 (f) With respect to the SUBJECT PROPERTY, state all assignments of rights that now, or
16 have ever, affected YOUR ownership interest in the claims being made in this lawsuit.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

18 Objection. This interrogatory seeks information that is equally available to the propounding
19 party and is therefore oppressive, burdensome and ambiguous. Panzalas v. Superior Court (1969)
20 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
21 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
22 “transferred,” and “assignment of right,” and fails to restrict the scope of the interrogatory to
23 information relevant to the subject of the Action. It also improperly seeks information that is
24 protected by the attorney work-product privilege pursuant to Code of Civil Procedure §2018. This
25 interrogatory seeks expert opinion and analysis and calls for a legal conclusion that is beyond the
26 expertise or knowledge of the responding party. Subject to the foregoing, and after conducting a
27 reasonable and good faith effort to search for documents and a reasonable and good faith effort to
28 obtain the information by inquiry to other natural persons or organizations, except where the

1 information is equally available to the propounding party, Plaintiff responds to this interrogatory
2 individually as follows:

3 (a) 1152 Bloomfield st, Heber, CA 92249;

4 (b) March 22, 2012;

5 (c) I do not recall;

6 (d) I have been the only owner since I purchased the property;

7 (e) Penny Mac. Loan Depot;

8 (f)None.

9 **SPECIAL INTERROGATORY NO. 5:**

10 Have YOU made any claims under any insurance policies or warranty policies for any
11 problems, DEFECTS, or DAMAGES related to the SUBJECT PROPERTY? If so, state:

12 (a) What date was the claim made;

13 (b) To whom the claim as made;

14 (c) Whether the claim was accepted or rejected;

15 (d) The nature of the claim;

16 (e) The IDENTITY of the insurer and policy number for each claim that was made.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

18 Objection. This interrogatory seeks information that is equally available and even more
19 readily accessible to the propounding party, and is therefore oppressive and burdensome. Panzalas
20 v. Superior Court (1969) 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This
21 interrogatory impermissibly assumes facts not in evidence. Furthermore, it is also vague,
22 ambiguous and overbroad with regard to what is meant by the terms “submitted,” “claim,”
23 “homeowner’s warranty,” and “homeowners insurance,” and fails to restrict the scope of the
24 interrogatory to information relevant to the subject of the Action. Subject to the foregoing, and
25 after conducting a reasonable and good faith effort to search for documents and a reasonable and
26 good faith effort to obtain the information by inquiry to other natural persons or organizations,
27 except where the information is equally available to the propounding party, Plaintiff responds to this
28 interrogatory individually as follows: No.

- 1 (a) Not applicable;
- 2 (b) Not applicable;
- 3 (c) Not applicable;
- 4 (d) Not applicable;
- 5 (e) Not applicable.

6 **SPECIAL INTERROGATORY NO. 6:**

7 As to any problems, DEFECTS, or DAMAGES that YOU may claim exist at the
8 SUBJECT PROPERTY, have YOU attempted to repair or have YOU repaired any of these
9 problems, DEFECTS or DAMAGES)? If yes, for each such repair, state

- 10 (a) The problem, DEFECT, or DAMAGE that was repaired or attempted to be
11 repaired;
- 12 (b) IDENTIFY who repaired or attempted to repair the problem, DEFECT, or
13 DAMAGE;
- 14 (c) The date(s) the attempt to repair or repair was made and completed; and
15 (d) The cost of repair.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

17 Objection. This interrogatory seeks information that is equally available and readily
18 accessible to the propounding party, and is further available within the pleadings and other
19 documents and discovery already available to the Parties in this matter, as well as readily available
20 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
21 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This interrogatory is vague,
22 ambiguous and overbroad with regard to what is meant by the terms “defect,” “damage,” and
23 “repair,” and fails to restrict the scope of the interrogatory to information relevant to the subject of
24 the Action. Plaintiffs further object on the grounds that this interrogatory seeks premature expert
25 discovery, as to what constitutes construction deficiencies in the real property at issue in this action
26 and to what extent and degree any such construction deficiencies are present. This interrogatory
27 seeks expert opinion and analysis, lacks foundation and calls for a legal conclusion that is beyond
28 the expertise or knowledge of the responding party. Plaintiffs do not have the expertise and therefor

1 is unable to make a determination as to what constitutes a construction deficiency, repair or
2 “condition” with the subject property or what if any repairs are successful. Plaintiffs’ counsel has
3 retained consultants to investigate the construction deficiencies in our home and to create a Defect
4 List and Cost of Repair Report as well as to provide repair recommendations regarding those
5 defects identified. (Please refer to Plaintiffs’ Defect List and Cost of Repair, which will be
6 deposited per the Court’s Case Management Order at the Depository specified therein.) Subject to
7 the foregoing, and after conducting a reasonable and good faith effort to search for documents and a
8 reasonable and good faith effort to obtain the information by inquiry to other natural persons or
9 organizations, except where the information is equally available to the propounding party, Plaintiff
10 responds as follows: Yes

- 11 (a) Water damage from a broken bathtub.
- 12 Mold in master bath ceiling;
- 13 (b) Myself;
- 14 (c) January 2017;
- 15 (d) \$300 but will be hiring a contractor damage is too big.
- 16 Clean mold on a monthly basis.

17 **SPECIAL INTERROGATORY NO. 7:**

18 With respect to any problems, DEFECTS, or DAMAGE YOU claim exists at the
19 SUBJECT PROPERTY in the lawsuit have YOU ever had a professional contractor or engineer,
20 except those hired through YOUR attorney, inspect the problems, DEFECTS, or DAMAGE? If
21 yes, then for each such professional provide:

- 22 (a) The date(s) of the inspection(s);
- 23 (b) The IDENTITY of the individual and/or company inspecting the problems,
24 DEFECTS, or DAMAGE;
- 25 (c) The general nature of the problems, DEFECTS, or DAMAGE inspected;
- 26 (d) The cost of inspection.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

28 Objection. This interrogatory seeks information that is equally available and even more

1 readily accessible to the propounding party, and is readily available in public record, and is
2 therefore oppressive and burdensome. Panzalas v. Superior Court (1969) 272 Cal.App.2d 499;
3 Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this interrogatory is vague,
4 ambiguous and overbroad with regard to what is meant by the terms “professional contractor”
5 "inspection", "defect", and "damage ". Subject to the foregoing, and after conducting a reasonable
6 and good faith effort to search for documents and a reasonable and good faith effort to obtain the
7 information by inquiry to other natural persons or organizations, except where the information is
8 equally available to the propounding party, Plaintiff responds as follows: No.

9 (a) Not applicable;

10 (b) Not applicable;

11 (c) Not applicable;

12 (d) Not applicable.

13 **SPECIAL INTERROGATORY NO. 8:**

14 With respect to the SUBJECT PROPERTY at issue in this lawsuit state/IDENTIFY:

15 (a) All changes, modifications, or additions that YOU have caused to be made to the
16 SUBJECT PROPERTY;

17 (b) All design professionals and contractors who, in any way, contributed to the
18 above identified changes, modifications, or additions.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

20 Objection. This interrogatory is objected to on the grounds that it is overbroad, indefinite as
21 to time, is without reasonable limitation in its scope, and is burdensome and oppressive, and that it
22 calls for expert opinion or analysis that is beyond the expertise or knowledge of the responding
23 party. This interrogatory is objected to on the grounds that it is vague, ambiguous and overly broad
24 in the use of the terms “state,” “modifications,” “additions,” “changes,” and “made,” and fails to
25 restrict the scope of the interrogatory to information relevant to the subject of the Action. This
26 interrogatory improperly seeks information that is protected by the attorney work-product privilege
27 pursuant to Code of Civil Procedure §§ 2018.010 et seq. This interrogatory seeks information that
28 is equally available and accessible to the propounding party, as well as readily available in public

1 record, and is therefore oppressive, burdensome and ambiguous. Panzalas v. Superior Court (1969)
2 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Subject to the foregoing, and
3 after conducting a reasonable and good faith effort to search for documents and a reasonable and
4 good faith effort to obtain the information by inquiry to other natural persons or organizations,
5 except where the information is equally available to the propounding party, Plaintiff responds to this
6 interrogatory individually as follows:

7 (a) Removed cracked cement in backyard and replaced with new one;

8 (b) Levy Estrada Landscaping.

9 **SPECIAL INTERROGATORY NO. 9:**

10 State the date upon which YOU retained the law firm and/or attorney representing YOU in
11 his litigation.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

13 Objection. Plaintiff objects to the extent that this interrogatory requests information
14 protected by the attorney work product privilege. Subject to the foregoing, and after conducting a
15 reasonable and good faith effort to search for documents and a reasonable and good faith effort to
16 obtain the information by inquiry to other natural persons or organizations, except where the
17 information is equally available to the propounding party, Plaintiff responds as follows: I do not
18 recall.

19 **SPECIAL INTERROGATORY NO. 10:**

20 With respect to the SUBJECT PROPERTY, state:

21 (a) Whether YOU are the current owner of the SUBJECT PROPERTY;

22 (b) If YOU are not the current owner of the SUBJECT PROPERTY, IDENTIFY the
23 PERSON/entity to whom YOU transferred YOUR ownership interest in the SUBJECT
24 PROPERTY;

25 (c) If YOU are not the current owner of the SUBJECT PROPERTY, state the date upon
26 which YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to a
27 subsequent owner;

28 (d) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to

1 another PERSON/entity, state how much YOU were paid for YOUR ownership interest in the
2 SUBJECT PROPERTY;

3 (e) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to
4 another PERSON/entity, IDENTIFY all real estate agencies, brokers, and sales persons who
5 were in any way involved in the transfer of YOUR ownership interest to such other
6 PERSON/entity;

7 (f) If YOU transferred YOUR ownership interest in the SUBJECT PROPERTY to
8 another PERSON/entity, IDENTIFY all escrow companies and officers who were in any way
9 involved in the transfer of YOUR ownership interest to such other PERSON/entity.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

11 Objection. This interrogatory seeks information that is equally available and even more
12 readily accessible to the propounding party, and is further available within the pleadings and other
13 documents and discovery already available to the Parties in this matter, as well as readily available
14 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
15 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
16 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
17 “owners.” Subject to the foregoing, and after conducting a reasonable and good faith effort to
18 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
19 other natural persons or organizations, except where the information is equally available to the
20 propounding party, Plaintiff responds as follows:

21 (a) Yes, I am the current owner.

22 (b) Not applicable;

23 (c) Not applicable;

24 (d) Not applicable;

25 (e) Not applicable;

26 (f) Not applicable.

27 //

28 //

1 **SPECIAL INTERROGATORY NO. 11:**

2 If YOU are a former owner of the SUBJECT PROPERTY:

3 (a) Did YOU disclose the fact that the SUBJECT PROPERTY was the subject of
4 pending litigation when YOU transferred YOUR interest in the SUBJECT PROPERTY?

5 (b) If YOU disclosed the pending litigation when YOU transferred YOUR ownership
6 interest in the SUBJECT PROPERTY to another PERSON/entity, IDENTIFY all PERSONS to
7 whom YOU made that disclosure;

8 (c) IDENTIFY all DOCUMENTS that relate in any way to YOUR transfer of YOUR
9 ownership interest in the SUBJECT PROPERTY to another PERSON/entity;(d) IDENTIFY all
10 DOCUMENTS that relate in any way to YOUR disclosure of the pending litigation to the
11 PERSON/entity to whom YOU transferred YOUR ownership interest in the SUBJECT
12 PROPERTY;

13 (e) IDENTIFY all DOCUMENTS that YOU disclosed to the PERSON/entity to whom
14 YOU transferred YOUR ownership interest in the SUBJECT PROPERTY that describe any
15 DEFECTS that YOU believed existed in the SUBJECT PROPERTY at the time that YOU
16 transferred YOUR ownership interest;

17 (f) If YOUR disclosure of DEFECTS that YOU believed existed in the SUBJECT
18 PROPERTY at the time YOU transferred YOUR ownership interest was not in writing, state the
19 DEFECTS that YOU otherwise disclosed.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

21 Objection. This interrogatory seeks information that is equally available and even more
22 readily accessible to the propounding party, and is further available within the pleadings and other
23 documents and discovery already available to the Parties in this matter, as well as readily available
24 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
25 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
26 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms
27 “owners.” Subject to the foregoing, and after conducting a reasonable and good faith effort to
28 search for documents and a reasonable and good faith effort to obtain the information by inquiry to

1 other natural persons or organizations, except where the information is equally available to the
2 propounding party, Plaintiff responds as follows:

3 (a) No.

4 (b) Not applicable;

5 (c) Not applicable;

6 (d) Not applicable;

7 (e) Not applicable;

8 (f) Not applicable.

9 **SPECIAL INTERROGATORY NO. 12:**

10 If YOU are a former owner of the SUBJECT PROPERTY:

11 (a) Did the PERSON/entity to whom YOU transferred YOUR ownership interest in the
12 SUBJECT PROPERTY ask YOU to repair any problems, DEFECTS, or DAMAGES that he/she/it
13 believed existed at the SUBJECT PROPERTY;

14 (b) If YOUR response to subpart (a) above is "yes" state the repairs that were
15 requested by the PERSON/entity to whom YOU transferred YOUR ownership interest;

16 (c) Was YOUR transfer of YOUR ownership interest in the SUBJECT PROPERTY
17 conditioned upon YOUR repair of any problems, DEFECTS, or DAMAGES that YOU disclosed at
18 the SUBJECT PROPERTY?

19 (d) If YOUR response to subpart (c) above is "yes", state the repairs that the
20 PERSON/entity to whom YOU transferred YOUR ownership interest required that YOU make to
21 the SUBJECT PROPERTY.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

23 Objection. This interrogatory seeks information that is equally available and even more
24 readily accessible to the propounding party, and is further available within the pleadings and other
25 documents and discovery already available to the Parties in this matter, as well as readily available
26 in public record, and is therefore oppressive and burdensome. Panzalas v. Superior Court (1969)
27 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. Furthermore, this
28 interrogatory is vague, ambiguous and overbroad with regard to what is meant by the terms

1 “owners.” Subject to the foregoing, and after conducting a reasonable and good faith effort to
2 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
3 other natural persons or organizations, except where the information is equally available to the
4 propounding party, Plaintiff responds as follows:

5 (a) No.

6 (b) Not applicable;

7 (c) No;

8 (d) Not applicable.

9
10 **SPECIAL INTERROGATORY NO. 13:**

11 During the time of ownership, was there in effect any policy of insurance through which
12 YOU were or might be insured in any manner (for example, primary, pro-rata, or excess liability
13 coverage or medical expense coverage) for damages, claims, or actions that have arisen out of the
14 issues in the case? If so, for each policy state

15 (a) The kind of Coverage;

16 (b) The name of the Insurance Company;

17 (c) Full Name of each Insured.

18 (d) The Policy Number.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

20 Objection. This interrogatory seeks information that is equally available and even more
21 readily accessible to the propounding party, and is therefore oppressive and burdensome. Panzalas
22 v. Superior Court (1969) 272 Cal.App.2d 499; Alpine v. Superior Court (1961) 56 Cal.2d 407. This
23 interrogatory impermissibly assumes facts not in evidence. Furthermore, it is also vague,
24 ambiguous and overbroad with regard to what is meant by the terms “insured,” “made a claim,” and
25 “claim,” and fails to restrict the scope of the interrogatory to information relevant to the subject of
26 the Action. Subject to the foregoing, and after conducting a reasonable and good faith effort to
27 search for documents and a reasonable and good faith effort to obtain the information by inquiry to
28 other natural persons or organizations, except where the information is equally available to the

1 propounding party, Plaintiff responds to this interrogatory individually as follows: Yes

2 (a) I do not recall;

3 (b) I do not recall;

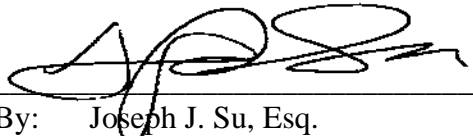
4 (c) I do not recall.

5

6 DATED: December 4, 2017

MILSTEIN JACKSON FAIRCHILD & WADE, LLP

7



A handwritten signature in black ink, appearing to read 'Joseph J. Su', is written over a horizontal line.

8

By: Joseph J. Su, Esq.
Attorney for Plaintiffs,
Alessio Faccin, et al.

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Christopher Carlon
1152 Bloomfield St
Heber CA 92249

SPECIAL INTERROGATORIES VERIFICATION

Alessio Faccin, et al. v. Pacific Century Homes, Inc., et al.

Case No.: ECU09044


I am a party to this action. The matters stated in the foregoing **RESPONSE TO SPECIAL INTERROGATORIES TO PLAINTIFF(S)** are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on Nov 20, 2017, at **Heber**, California.
(date)

1st Owner:

Christopher Carlon
Name


Signature

2nd Owner (if any):

Nancy Carlon
Name


Signature