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OUTDOOR RESORTS OF AMERICA, INC. and  
7 OUTDOOR RESORTS RANCHO CALIFORNIA, INC.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF RIVERSIDE

10 RANCHO CALIFORNIA RV RESORT )  
OWNERS ASSOCIATION, a California )  
11 corporation, )  
12 Plaintiff, )  
13 vs. )  
14 OUTDOOR RESORTS OF AMERICA, )  
INC., a California corporation; OUTDOOR )  
15 RESORTS OF RANCHO CALIFORNIA, )  
INC., a California corporation; and DOES 1 )  
16 through 100, inclusive, )  
17 Defendants. )  
18 \_\_\_\_\_ )  
AND ALL RELATED CROSS-ACTIONS )  
19 \_\_\_\_\_ )

Case No. RIC469533  
(Assigned for all purposes to the  
Honorable Thomas Cahraman)  
Dept. 8

**DEFENDANT OUTDOOR RESORTS  
OF AMERICA, INC.'S RESPONSE TO  
PLAINTIFF'S SPECIAL  
INTERROGATORIES (SET ONE)**

20  
21 PROPOUNDING PARTY: Plaintiff RANCHO CALIFORNIA RV RESORT OWNERS  
ASSOCIATION  
22  
23 RESPONDING PARTY: Defendant OUTDOOR RESORTS OF AMERICA, INC.  
24  
25 SET NO.: ONE

26 Defendant OUTDOOR RESORTS OF AMERICA, INC. (hereinafter referred to as  
"Responding Party") hereby responds to the First Set of Special Interrogatories propounded by  
27 Plaintiff RANCHO CALIFORNIA RV RESORT OWNERS ASSOCIATION as follows:

28 ///  
///



1 the General Objections as specific objections to individual interrogatories. Such restatement, or  
2 the lack of such restatement, is not intended to be and is not a waiver of any General Objection not  
3 restated.

4 1. Responding Party objects to the Interrogatories in their entirety to the extent they  
5 seek information protected from disclosure and discovery by virtue of the attorney-client privilege,  
6 the attorney work product doctrine, or any other applicable privilege or immunity, and refuses to  
7 produce any such information or documents. Responding Party does not intend by these responses  
8 or objections to waive any claim of privilege or immunity. Responding Party's objections and  
9 responses are conditioned specifically on the understanding that the provision of information or  
10 documents for which any claim of privilege is applicable shall be deemed inadvertent, and not a  
11 waiver of the claim or privilege.

12 2. Responding Party objects to the Interrogatories in their entirety to the extent they  
13 call for Responding Party to provide legal reasoning and/or legal theories in response thereto.

14 3. Responding Party objects to the Interrogatories in their entirety to the extent they  
15 prematurely seek expert discovery.

16 4. Responding Party objects to the Interrogatories in their entirety to the extent they  
17 require Responding Party to discover information not within his possession, custody or control, or  
18 information equally available to Propounding Party.

19 5. Responding Party objects to the Interrogatories in their entirety to the extent they  
20 are overly broad, seek information that is not relevant to the subject matter of this action, and/or  
21 are not reasonably calculated to lead to the discovery of admissible evidence.

22 6. Responding Party objects to the Interrogatories in their entirety to the extent they  
23 are unreasonably burdensome, oppressive and harassing.

24 7. Responding Party objects to the Interrogatories in their entirety to the extent they  
25 seek information which is protected from disclosure and discovery by virtue of anyone's rights of  
26 privacy as provided by the California and United States Constitutions and/or any other statute or  
27 legal authority.

28 8. Responding Party objects to the Interrogatories in their entirety to the extent they

1 are vague, ambiguous and unintelligible.

2 9. Responding Party objects to the Interrogatories in their entirety to the extent that  
3 their use of defined terms in individual interrogatories renders those interrogatories vague and  
4 ambiguous.

5 10. Responding Party objects to the Interrogatories in their entirety to the extent that  
6 their use of undefined terms in individual interrogatories renders those interrogatories vague and  
7 ambiguous.

8 **SPECIFIC RESPONSES AND OBJECTIONS**

9 Without waiving the Preliminary Statement and General Objections set forth above, and  
10 subject to them, Responding Party objects and responds to the Special Interrogatories as follows:

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

12 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
13 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
14 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
15 "relationship." Responding Party further objects to this Interrogatory on the grounds that it calls for  
16 an impermissible legal conclusion, seeks information which is protected by the attorney-client  
17 privilege and the attorney work product doctrine and seeks information which amounts to an  
18 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
19 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
20 not relevant to the subject matter of the action. However, without waiving said objections,  
21 Responding Party responds as follows:

22 Outdoor Resorts Rancho California, Inc. (hereinafter "ORRC") is a wholly owned  
23 subsidiary of Responding Party.

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

25 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
26 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
27 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
28 information which is protected by the attorney-client privilege and the attorney work product

1 doctrine and seeks information which amounts to an impermissible request for expert discovery  
2 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
3 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
4 action.

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

6 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
7 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
8 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
9 information which is protected by the attorney-client privilege and the attorney work product  
10 doctrine and seeks information which amounts to an impermissible request for expert discovery  
11 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
12 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
13 action.

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

15 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
16 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
17 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
18 information which is protected by the attorney-client privilege and the attorney work product  
19 doctrine and seeks information which amounts to an impermissible request for expert discovery  
20 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
21 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
22 action and that it seeks information protected by right of privacy.

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

24 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
25 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
26 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
27 information which is protected by the attorney-client privilege and the attorney work product  
28 doctrine and seeks information which amounts to an impermissible request for expert discovery

1 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
2 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
3 action and that it seeks information protected by right of privacy.

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

5 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
6 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
7 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
8 information which is protected by the attorney-client privilege and the attorney work product  
9 doctrine and seeks information which amounts to an impermissible request for expert discovery  
10 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
11 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
12 action and that it seeks information protected by right of privacy.

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

14 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
15 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
16 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
17 information which is protected by the attorney-client privilege and the attorney work product  
18 doctrine and seeks information which amounts to an impermissible request for expert discovery  
19 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
20 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
21 action and that it seeks information protected by right of privacy.

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

23 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
24 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
25 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
26 information which is protected by the attorney-client privilege and the attorney work product  
27 doctrine and seeks information which amounts to an impermissible request for expert discovery  
28 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to

1 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
2 action and that it seeks information protected by right of privacy.

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

4 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
5 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
6 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
7 information which is protected by the attorney-client privilege and the attorney work product  
8 doctrine and seeks information which amounts to an impermissible request for expert discovery  
9 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
10 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
11 action and that it seeks information protected by right of privacy.

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

13 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
14 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
15 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
16 “ownership interest.” Responding Party further objects to this Interrogatory on the grounds that it  
17 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
18 client privilege and the attorney work product doctrine and seeks information which amounts to an  
19 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
20 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
21 not relevant to the subject matter of the action. However, without waiving said objections,  
22 Responding Party responds as follows:

23 See response to Interrogatory No. 1 above.

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

25 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
26 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
27 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
28 “ownership interest.” Responding Party further objects to this Interrogatory on the grounds that it

1 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
2 client privilege and the attorney work product doctrine and seeks information which amounts to an  
3 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
4 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
5 not relevant to the subject matter of the action. However, without waiving said objections,  
6 Responding Party responds as follows:

7 See response to Interrogatory No. 1 above.

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

9 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
10 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
11 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
12 information which is protected by the attorney-client privilege and the attorney work product  
13 doctrine and seeks information which amounts to an impermissible request for expert discovery  
14 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
15 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
16 action.

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

18 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
19 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
20 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
21 information which is protected by the attorney-client privilege and the attorney work product  
22 doctrine and seeks information which amounts to an impermissible request for expert discovery  
23 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
24 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
25 action.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

27 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
28 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to

1 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
2 information which is protected by the attorney-client privilege and the attorney work product  
3 doctrine and seeks information which amounts to an impermissible request for expert discovery  
4 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
5 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
6 action.

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

8 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
9 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
10 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
11 information which is protected by the attorney-client privilege and the attorney work product  
12 doctrine and seeks information which amounts to an impermissible request for expert discovery  
13 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
14 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
15 action.

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

17 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
18 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
19 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
20 “ownership interest.” Responding Party further objects to this Interrogatory on the grounds that it  
21 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
22 client privilege and the attorney work product doctrine and seeks information which amounts to an  
23 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
24 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
25 not relevant to the subject matter of the action and that it seeks information protected by right of  
26 privacy.

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

28 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is

1 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
2 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
3 “ownership interest.” Responding Party further objects to this Interrogatory on the grounds that it  
4 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
5 client privilege and the attorney work product doctrine and seeks information which amounts to an  
6 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
7 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
8 not relevant to the subject matter of the action and that it seeks information protected by right of  
9 privacy.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

11 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
12 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
13 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “any  
14 portion.” Responding Party further objects to this Interrogatory on the grounds that it calls for an  
15 impermissible legal conclusion, seeks information which is protected by the attorney-client  
16 privilege and the attorney work product doctrine and seeks information which amounts to an  
17 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
18 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
19 not relevant to the subject matter of the action. However, without waiving said objections,  
20 Responding Party responds as follows:

21 No.

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

23 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
24 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
25 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “any  
26 portion.” Responding Party further objects to this Interrogatory on the grounds that it calls for an  
27 impermissible legal conclusion, seeks information which is protected by the attorney-client  
28 privilege and the attorney work product doctrine and seeks information which amounts to an

1 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
2 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
3 not relevant to the subject matter of the action. However, without waiving said objections,  
4 Responding Party responds as follows:

5 This interrogatory is inapplicable. See response to interrogatory No. 18 above.

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

7 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
8 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
9 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “any  
10 portion.” Responding Party further objects to this Interrogatory on the grounds that it calls for an  
11 impermissible legal conclusion, seeks information which is protected by the attorney-client  
12 privilege and the attorney work product doctrine and seeks information which amounts to an  
13 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
14 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
15 not relevant to the subject matter of the action.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

17 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
18 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
19 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
20 “ownership interest.” Responding Party further objects to this Interrogatory on the grounds that it  
21 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
22 client privilege and the attorney work product doctrine and seeks information which amounts to an  
23 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
24 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
25 not relevant to the subject matter of the action.

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

27 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
28 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to

1 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
2 information which is protected by the attorney-client privilege and the attorney work product  
3 doctrine and seeks information which amounts to an impermissible request for expert discovery  
4 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
5 Responding Party responds as follows:

6 Yes.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

8 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
9 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
10 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
11 information which is protected by the attorney-client privilege and the attorney work product  
12 doctrine and seeks information which amounts to an impermissible request for expert discovery  
13 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
14 Responding Party responds as follows:

15 Tentative parcel maps and environmental reports. Unknown at this time as to other  
16 documents submitted. Discovery and investigation are ongoing and as such, Responding Party  
17 reserves the right to supplement its response should additional information and/or documentation  
18 become available.

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

20 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
21 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
22 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
23 information which is protected by the attorney-client privilege and the attorney work product  
24 doctrine and seeks information which amounts to an impermissible request for expert discovery  
25 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
26 Responding Party responds as follows:

27 Conditional Use Permit No. 1748R2 was a re-issuance of Conditional Use Permit No.  
28 1748R1, thus did not require re-submission.

1     **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

2             Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
3     vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
4     this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
5     information which is protected by the attorney-client privilege and the attorney work product  
6     doctrine and seeks information which amounts to an impermissible request for expert discovery  
7     pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
8     Responding Party responds as follows:

9             See response to Interrogatory No. 24 above.

10    **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

11            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
12    vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
13    this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
14    information which is protected by the attorney-client privilege and the attorney work product  
15    doctrine and seeks information which amounts to an impermissible request for expert discovery  
16    pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
17    Responding Party responds as follows:

18            Outdoor Resorts of America, Inc.'s former president, Randal Henderson. Unknown as to  
19    others at this time. Discovery and investigation are ongoing and as such, Responding Party reserves  
20    the right to supplement its response should additional information and/or documentation become  
21    available.

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

23            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
24    vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
25    this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
26    information which is protected by the attorney-client privilege and the attorney work product  
27    doctrine and seeks information which amounts to an impermissible request for expert discovery  
28    pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to

1 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
2 action.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

4 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
5 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
6 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
7 information which is protected by the attorney-client privilege and the attorney work product  
8 doctrine and seeks information which amounts to an impermissible request for expert discovery  
9 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
10 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
11 action.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

13 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
14 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
15 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
16 information which is protected by the attorney-client privilege and the attorney work product  
17 doctrine and seeks information which amounts to an impermissible request for expert discovery  
18 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
19 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
20 action.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

22 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
23 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
24 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
25 information which is protected by the attorney-client privilege and the attorney work product  
26 doctrine and seeks information which amounts to an impermissible request for expert discovery  
27 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
28 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the

1 action.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

3 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
4 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
5 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
6 information which is protected by the attorney-client privilege and the attorney work product  
7 doctrine and seeks information which amounts to an impermissible request for expert discovery  
8 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
9 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
10 action.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

12 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
13 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
14 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
15 “agreements” and as to “operation.” Responding Party further objects to this Interrogatory on the  
16 grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
17 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
18 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
19 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
20 follows:

21 None.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 33:**

23 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
24 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
25 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
26 “agreements” and as to “operation.” Responding Party further objects to this Interrogatory on the  
27 grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
28 by the attorney-client privilege and the attorney work product doctrine and seeks information which

1 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
2 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
3 follows:

4 None.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 34:**

6 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
7 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
8 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
9 “agreements.” Responding Party further objects to this Interrogatory on the grounds that it calls  
10 for an impermissible legal conclusion, seeks information which is protected by the attorney-client  
11 privilege and the attorney work product doctrine and seeks information which amounts to an  
12 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
13 However, without waiving said objections, Responding Party responds as follows:

14 None.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 35:**

16 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
17 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
18 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
19 “agreements.” Responding Party further objects to this Interrogatory on the grounds that it calls for  
20 an impermissible legal conclusion, seeks information which is protected by the attorney-client  
21 privilege and the attorney work product doctrine and seeks information which amounts to an  
22 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
23 However, without waiving said objections, Responding Party responds as follows:

24 None.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 36:**

26 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
27 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
28 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to

1 “agreements” and as to “maintenance.” Responding Party further objects to this Interrogatory on  
2 the grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
3 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
4 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
5 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
6 follows:

7 None.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 37:**

9 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
10 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
11 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
12 “agreements” and as to “maintenance.” Responding Party further objects to this Interrogatory on  
13 the grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
14 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
15 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
16 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
17 follows:

18 None.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 38:**

20 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
21 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
22 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
23 “emergency access road” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party  
24 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
25 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
26 work product doctrine and seeks information which amounts to an impermissible request for expert  
27 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
28 objections, Responding Party responds as follows:

1 ORRC did.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 39:**

3 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
4 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
5 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
6 “emergency access road” and as to “SUBJECT PROPERTY.” Responding Party further objects to  
7 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
8 information which is protected by the attorney-client privilege and the attorney work product  
9 doctrine and seeks information which amounts to an impermissible request for expert discovery  
10 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
11 Responding Party responds as follows:

12 See response to Interrogatory No. 38 above.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 40:**

14 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
15 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
16 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
17 “electrical systems;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that Responding  
18 Party itself did not perform the actual “WORK” which was performed by subcontractors, other  
19 independent contractors and/or design professionals. Responding Party further objects to this  
20 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
21 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
22 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
23 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
24 responds as follows:

25 This interrogatory requires a summary of compilation of information from documents  
26 previously produced by Responding Party and other Parties in this matter. As such, and pursuant  
27 to *Code of Civil Procedure* §2030.230, Responding Party refers to such documents rather than  
28 prepare such summary or compilation. Discovery and investigation are ongoing and as such,

1 Responding Party reserves the right to supplement its response should additional information and/or  
2 documentation become available.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 41:**

4 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
5 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
6 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “fire  
7 flow system;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that Responding Party  
8 itself did not perform the actual “WORK” which was performed by subcontractors, other  
9 independent contractors and/or design professionals. Responding Party further objects to this  
10 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
11 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
12 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
13 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
14 responds as follows:

15 Responding Party does not recall the specific detail in regard to the work referenced in this  
16 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
17 right to supplement its response should additional information and/or documentation become  
18 available.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 42:**

20 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
21 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
22 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “fire  
23 hydrant system;” and as to “SUBJECT PROPERTY; and as to “YOU,” in that Responding Party  
24 itself did not perform the actual “WORK” which was performed by subcontractors, other  
25 independent contractors and/or design professionals. Responding Party further objects to this  
26 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
27 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
28 information which amounts to an impermissible request for expert discovery pursuant to *Code of*

1 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
2 responds as follows:

3 Responding Party does not recall the specific detail in regard to the work referenced in this  
4 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
5 right to supplement its response should additional information and/or documentation become  
6 available.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 43:**

8 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
9 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
10 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
11 “grading;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that Responding Party itself  
12 did not perform the actual “WORK” which was performed by subcontractors, other independent  
13 contractors and/or design professionals. Responding Party further objects to this Interrogatory on  
14 the grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
15 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
16 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
17 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
18 follows:

19 Responding Party does not recall the specific detail in regard to the work referenced in this  
20 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
21 right to supplement its response should additional information and/or documentation become  
22 available.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 44:**

24 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
25 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
26 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
27 “drainage;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that Responding Party itself  
28 did not perform the actual “WORK” which was performed by subcontractors, other independent

1 contractors and/or design professionals. Responding Party further objects to this Interrogatory on  
2 the grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
3 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
4 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
5 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
6 follows:

7           Responding Party does not recall the specific detail in regard to the work referenced in this  
8 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
9 right to supplement its response should additional information and/or documentation become  
10 available.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 45:**

12           Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
13 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
14 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
15 “tributary 100 year storm flows;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that  
16 Responding Party itself did not perform the actual “WORK” which was performed by  
17 subcontractors, other independent contractors and/or design professionals. Responding Party further  
18 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
19 information which is protected by the attorney-client privilege and the attorney work product  
20 doctrine and seeks information which amounts to an impermissible request for expert discovery  
21 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
22 Responding Party responds as follows:

23           Responding Party does not recall the specific detail in regard to the work referenced in this  
24 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
25 right to supplement its response should additional information and/or documentation become  
26 available.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 46:**

28           Objection. Responding Party objects to this Special Interrogatory on the grounds that it is

1 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
2 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
3 “escape paths for flood flows;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that  
4 Responding Party itself did not perform the actual “WORK” which was performed by  
5 subcontractors, other independent contractors and/or design professionals. Responding Party further  
6 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
7 information which is protected by the attorney-client privilege and the attorney work product  
8 doctrine and seeks information which amounts to an impermissible request for expert discovery  
9 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
10 Responding Party responds as follows:

11           Responding Party does not recall the specific detail in regard to the work referenced in this  
12 interrogatory. Discovery and investigation are ongoing and as such, Responding Party reserves the  
13 right to supplement its response should additional information and/or documentation become  
14 available.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 47:**

16           Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
17 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
18 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
19 “YOU,” in that Responding Party itself did not perform the actual “WORK” which was performed  
20 by subcontractors, other independent contractors and/or design professionals. Responding Party  
21 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
22 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
23 work product doctrine and seeks information which amounts to an impermissible request for expert  
24 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
25 objections, Responding Party responds as follows:

26           The work referenced in this interrogatory was performed by subcontractors, other  
27 independent contractors and/or design professionals, and said work included construction of entry  
28 sign, paving of entry road; submission of plans. Discovery and investigation are ongoing and as

1 such, Responding Party reserves the right to supplement its response should additional information  
2 and/or documentation become available.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 48:**

4         Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
5 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
6 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
7 “YOU,” in that Responding Party itself did not perform the actual “WORK” which was performed  
8 by subcontractors, other independent contractors and/or design professionals. Responding Party  
9 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
10 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
11 work product doctrine and seeks information which amounts to an impermissible request for expert  
12 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
13 objections, Responding Party responds as follows:

14         Caltrans made recommendations, by way of comment to the Conditional Use Permit, as to  
15 deceleration and acceleration lanes, however, the County of Riverside accepted the proposal to  
16 leave said recommendation on hold until completion of final phases of the subject project and to  
17 revisit the matter at that time after further traffic studies have been performed to see whether said  
18 recommendations would still be necessary. Discovery and investigation are ongoing and as such,  
19 Responding Party reserves the right to supplement its response should additional information and/or  
20 documentation become available.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 49:**

22         Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
23 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
24 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
25 “YOU,” in that Responding Party itself did not perform the actual “WORK” which was performed  
26 by subcontractors, other independent contractors and/or design professionals. Responding Party  
27 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
28 conclusion, seeks information which is protected by the attorney-client privilege and the attorney

1 work product doctrine and seeks information which amounts to an impermissible request for expert  
2 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
3 objections, Responding Party responds as follows:

4 See response to interrogatory No. 48 above.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 50:**

6 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
7 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
8 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
9 “certification” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party further  
10 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
11 information which is protected by the attorney-client privilege and the attorney work product  
12 doctrine and seeks information which amounts to an impermissible request for expert discovery  
13 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
14 Responding Party responds as follows:

15 Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
16 reserves the right to supplement its response should additional information and/or documentation  
17 become available.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 51:**

19 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
20 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
21 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
22 “certification” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party further  
23 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
24 information which is protected by the attorney-client privilege and the attorney work product  
25 doctrine and seeks information which amounts to an impermissible request for expert discovery  
26 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
27 Responding Party responds as follows:

28 See response to interrogatory No. 50.

1     **RESPONSE TO SPECIAL INTERROGATORY NO. 52:**

2             Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
3     vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
4     to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
5     “certified” and as to “SUBJECT PROPERTY.” Responding Party further objects to this  
6     Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
7     which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
8     information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
9     *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
10    responds as follows:

11            Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
12    reserves the right to supplement its response should additional information and/or documentation  
13    become available.

14    **RESPONSE TO SPECIAL INTERROGATORY NO. 53:**

15            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
16    vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
17    to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
18    “certification” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party further  
19    objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
20    information which is protected by the attorney-client privilege and the attorney work product  
21    doctrine and seeks information which amounts to an impermissible request for expert discovery  
22    pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
23    Responding Party responds as follows:

24            Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
25    reserves the right to supplement its response should additional information and/or documentation  
26    become available.

27    **RESPONSE TO SPECIAL INTERROGATORY NO. 54:**

28            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is

1 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
2 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
3 “certification” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party further  
4 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
5 information which is protected by the attorney-client privilege and the attorney work product  
6 doctrine and seeks information which amounts to an impermissible request for expert discovery  
7 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
8 Responding Party responds as follows:

9           See response to interrogatory No. 53 above.

10  
11 **RESPONSE TO SPECIAL INTERROGATORY NO. 55:**

12           Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
13 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
14 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
15 “certified” and as to “SUBJECT PROPERTY.” Responding Party further objects to this  
16 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
17 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
18 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
19 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
20 responds as follows:

21           Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
22 reserves the right to supplement its response should additional information and/or documentation  
23 become available.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 56:**

25           Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
26 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
27 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “fire  
28 protection/vegetation management plan.” Responding Party further objects to this Interrogatory on

1 the grounds that it calls for an impermissible legal conclusion, seeks information which is protected  
2 by the attorney-client privilege and the attorney work product doctrine and seeks information which  
3 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
4 §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
5 follows:

6 Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
7 reserves the right to supplement its response should additional information and/or documentation  
8 become available.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 57:**

10 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
11 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
12 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
13 “shading, parking, parking lot, lighting, landscaping, and irrigation plan.” Responding Party further  
14 objects to this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
15 information which is protected by the attorney-client privilege and the attorney work product  
16 doctrine and seeks information which amounts to an impermissible request for expert discovery  
17 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said objections,  
18 Responding Party responds as follows:

19 Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
20 reserves the right to supplement its response should additional information and/or documentation  
21 become available.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 58:**

23 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
24 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
25 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
26 “designated fire lanes with signage” and as to “SUBJECT PROPERTY” and as to “YOU.”  
27 Responding Party further objects to this Interrogatory on the grounds that it calls for an  
28 impermissible legal conclusion, seeks information which is protected by the attorney-client

1 privilege and the attorney work product doctrine and seeks information which amounts to an  
2 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
3 However, without waiving said objections, Responding Party responds as follows:

4 Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
5 reserves the right to supplement its response should additional information and/or documentation  
6 become available.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 59:**

8 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
9 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
10 to this Request on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
11 “illuminated display boards or signs” and as to “YOU.” Responding Party further objects to this  
12 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
13 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
14 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
15 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
16 responds as follows:

17 ORRC has not as of yet; the subject project is still ongoing.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 60:**

19 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
20 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
21 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
22 “SUBJECT PROPERTY;” and as to “YOU,” in that Responding Party itself did not perform the  
23 actual work which was performed by subcontractors, other independent contractors and/or design  
24 professionals. Responding Party further objects to this Interrogatory on the grounds that it calls for  
25 an impermissible legal conclusion, seeks information which is protected by the attorney-client  
26 privilege and the attorney work product doctrine and seeks information which amounts to an  
27 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
28 However, without waiving said objections, Responding Party responds as follows:

1 ORRC did.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 61:**

3 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
4 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
5 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
6 “irrigation system;” and as to “SUBJECT PROPERTY;” and as to “YOU,” in that Responding  
7 Party itself did not perform the actual “WORK” which was performed by subcontractors, other  
8 independent contractors and/or design professionals. Responding Party further objects to this  
9 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
10 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
11 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
12 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
13 responds as follows:

14 Unknown at this. Discovery and investigation are ongoing and as such, Responding Party  
15 reserves the right to supplement its response should additional information and/or documentation  
16 become available.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 62:**

18 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
19 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
20 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “trash  
21 enclosures” and as to “SUBJECT PROPERTY.” Responding Party further objects to this  
22 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
23 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
24 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
25 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
26 responds as follows:

27 No, ORRC has not, due to exemption from County of Riverside as to current phases, and  
28 the project is still ongoing.

1     **RESPONSE TO SPECIAL INTERROGATORY NO. 63:**

2             Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
3     vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
4     to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
5     “SUBJECT PROPERTY” and as to “YOU” and “YOUR.” Responding Party further objects to this  
6     Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
7     which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
8     information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
9     *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
10    responds as follows:

11            Yes, on behalf of ORRC, by Vincent Di Donato, Landscape Architect of Alhambra Group.

12     **RESPONSE TO SPECIAL INTERROGATORY NO. 64:**

13            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
14    vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
15    to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
16    “SUBJECT PROPERTY.” Responding Party further objects to this Interrogatory on the grounds  
17    that it calls for an impermissible legal conclusion, seeks information which is protected by the  
18    attorney-client privilege and the attorney work product doctrine and seeks information which  
19    amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
20    §2034.210, *et seq.* However, without waiving said objections, Responding Party responds as  
21    follows:

22            Vincent Di Donato, Landscape Architect of Alhambra Group.

23     **RESPONSE TO SPECIAL INTERROGATORY NO. 65:**

24            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
25    vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
26    to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
27    “SUBJECT PROPERTY” and as to “YOU” and “YOUR.” Responding Party further objects to this  
28    Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information

1 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
2 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
3 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
4 responds as follows:

5 Submitted to Department of Planning And Land Use on behalf of ORRC, by Vincent Di  
6 Donato, Landscape Architect of Alhambra Group.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 66:**

8 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
9 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
10 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
11 “YOU,” in that Responding Party itself did not perform the actual “WORK” which was performed  
12 by subcontractors, other independent contractors and/or design professionals. Responding Party  
13 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
14 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
15 work product doctrine and seeks information which amounts to an impermissible request for expert  
16 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
17 objections, Responding Party responds as follows:

18 See response to interrogatory No. 48 above. Also, engineering plans were submitted in  
19 regard to work referenced in this interrogatory.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 67:**

21 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
22 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
23 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
24 “YOU,” in that Responding Party itself did not perform the actual “WORK” which was performed  
25 by subcontractors, other independent contractors and/or design professionals. Responding Party  
26 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
27 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
28 work product doctrine and seeks information which amounts to an impermissible request for expert

1 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* However, without waiving said  
2 objections, Responding Party responds as follows:

3 See response to interrogatory No. 48 above. Also, engineering plans were submitted in  
4 regard to work referenced in this interrogatory.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 68:**

6 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
7 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to this  
8 Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks information  
9 which is protected by the attorney-client privilege and the attorney work product doctrine and seeks  
10 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
11 *Civil Procedure* §2034.210, *et seq.* However, without waiving said objections, Responding Party  
12 responds as follows:

13 See response to interrogatory No. 48 above.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 69:**

15 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
16 vague, Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
17 “drainage study.” Responding Party further objects to this Interrogatory on the grounds that it calls  
18 for an impermissible legal conclusion, seeks information which is protected by the attorney-client  
19 privilege and the attorney work product doctrine and seeks information which amounts to an  
20 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
21 However, without waiving said objections, Responding Party responds as follows:

22 Daniel Ferguson.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 70:**

24 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
25 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
26 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
27 “drainage study.” Responding Party further objects to this Interrogatory on the grounds that it calls  
28 for an impermissible legal conclusion, seeks information which is protected by the attorney-client

1 privilege and the attorney work product doctrine and seeks information which amounts to an  
2 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
3 However, without waiving said objections, Responding Party responds as follows:

4 This interrogatory requires a summary of compilation of information from documents  
5 previously produced by Responding Party. As such, and pursuant to *Code of Civil Procedure*  
6 §2030.230, Responding Party refers to such documents rather than prepare such summary or  
7 compilation. Discovery and investigation are ongoing and as such, Responding Party reserves the  
8 right to supplement its response should additional information and/or documentation become  
9 available.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 71:**

11 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
12 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
13 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
14 “drainage study.” Responding Party further objects to this Interrogatory on the grounds that it calls  
15 for an impermissible legal conclusion, seeks information which is protected by the attorney-client  
16 privilege and the attorney work product doctrine and seeks information which amounts to an  
17 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
18 However, without waiving said objections, Responding Party responds as follows:

19 This interrogatory is inapplicable. See response to Interrogatory Nos. 69 and 70 above.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 72:**

21 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
22 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
23 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
24 “drainage study.” Responding Party further objects to this Interrogatory on the grounds that it calls  
25 for an impermissible legal conclusion, seeks information which is protected by the attorney-client  
26 privilege and the attorney work product doctrine and seeks information which amounts to an  
27 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
28 However, without waiving said objections, Responding Party responds as follows:

1 Phases 1 through 7.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 73:**

3 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
4 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
5 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “all  
6 insurance policies,” and as to “coverage.” Responding Party further objects to this Interrogatory  
7 on the grounds that it calls for an impermissible legal conclusion, seeks information which is  
8 protected by the attorney-client privilege and the attorney work product doctrine and seeks  
9 information which amounts to an impermissible request for expert discovery pursuant to *Code of*  
10 *Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to this Interrogatory on  
11 the grounds that it seeks information not relevant to the subject matter of the action. However,  
12 without waiving said objections, Responding Party responds as follows:

13 This interrogatory requires a summary of compilation of information from insurance policy  
14 documents to produced by Responding Party in this matter. As such, and pursuant to *Code of Civil*  
15 *Procedure* §2030.230, Responding Party refers to such documents rather than prepare such  
16 summary or compilation. Discovery and investigation are ongoing and as such, Responding Party  
17 reserves the right to supplement its response should additional information and/or documentation  
18 become available.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 74:**

20 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
21 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
22 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
23 “boundary line changes.” Responding Party further objects to this Interrogatory on the grounds that  
24 it calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
25 client privilege and the attorney work product doctrine and seeks information which amounts to an  
26 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
27 In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
28 not relevant to the subject matter of the action.

1     **RESPONSE TO SPECIAL INTERROGATORY NO. 75:**

2             Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
3     vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
4     to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
5     “additional phases added.” Responding Party further objects to this Interrogatory on the grounds  
6     that it calls for an impermissible legal conclusion, seeks information which is protected by the  
7     attorney-client privilege and the attorney work product doctrine and seeks information which  
8     amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
9     §2034.210, *et seq.* In addition, Responding Party objects to this Interrogatory on the grounds that  
10    it seeks information not relevant to the subject matter of the action.

11    **RESPONSE TO SPECIAL INTERROGATORY NO. 76:**

12            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
13    vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
14    to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to “any  
15    bonds.” Responding Party further objects to this Interrogatory on the grounds that it calls for an  
16    impermissible legal conclusion, seeks information which is protected by the attorney-client  
17    privilege and the attorney work product doctrine and seeks information which amounts to an  
18    impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
19    In addition, Responding Party objects to this Interrogatory on the grounds that it seeks information  
20    not relevant to the subject matter of the action.

21    **RESPONSE TO SPECIAL INTERROGATORY NO. 77:**

22            Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
23    vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
24    to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
25    “condominium plans” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party  
26    further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
27    conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
28    work product doctrine and seeks information which amounts to an impermissible request for expert

1 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party  
2 objects to this Interrogatory on the grounds that it seeks information not relevant to the subject  
3 matter of the action. However, without waiving said objections, Responding Party responds as  
4 follows:

5 ORRC did.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 78:**

7 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
8 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
9 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
10 “condominium plans” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party  
11 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
12 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
13 work product doctrine and seeks information which amounts to an impermissible request for expert  
14 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party  
15 objects to this Interrogatory on the grounds that it seeks information not relevant to the subject  
16 matter of the action. However, without waiving said objections, Responding Party responds as  
17 follows:

18 ORRC submitted condominium plans to subdivide the property.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 79:**

20 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
21 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
22 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
23 “condominium plans” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party  
24 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
25 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
26 work product doctrine and seeks information which amounts to an impermissible request for expert  
27 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party  
28 objects to this Interrogatory on the grounds that it seeks information not relevant to the subject

1 matter of the action. However, without waiving said objections, Responding Party responds as  
2 follows:

3 ORRC submitted condominium plans for Phases 1 through 6.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 80:**

5 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
6 vague, ambiguous, overbroad, burdensome and oppressive. Responding Party further objects to  
7 this Interrogatory on the grounds that it calls for an impermissible legal conclusion, seeks  
8 information which is protected by the attorney-client privilege and the attorney work product  
9 doctrine and seeks information which amounts to an impermissible request for expert discovery  
10 pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party objects to  
11 this Interrogatory on the grounds that it seeks information not relevant to the subject matter of the  
12 action.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 81:**

14 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
15 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
16 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
17 “condominium plans” and as to “SUBJECT PROPERTY” and as to “YOU.” Responding Party  
18 further objects to this Interrogatory on the grounds that it calls for an impermissible legal  
19 conclusion, seeks information which is protected by the attorney-client privilege and the attorney  
20 work product doctrine and seeks information which amounts to an impermissible request for expert  
21 discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.* In addition, Responding Party  
22 objects to this Interrogatory on the grounds that it seeks information not relevant to the subject  
23 matter of the action. However, without waiving said objections, Responding Party responds as  
24 follows:

25 ORRC was the entity that submitted condominium plans.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 82:**

27 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
28 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects

1 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
2 "SUBJECT PROPERTY," and as to "YOU," in that Responding Party itself did not perform the  
3 actual "WORK" which was performed by subcontractors, other independent contractors and/or  
4 design professionals. Responding Party further objects to this Interrogatory on the grounds that it  
5 calls for an impermissible legal conclusion, seeks information which is protected by the attorney-  
6 client privilege and the attorney work product doctrine and seeks information which amounts to an  
7 impermissible request for expert discovery pursuant to *Code of Civil Procedure* §2034.210, *et seq.*  
8 However, without waiving said objections, Responding Party responds as follows:

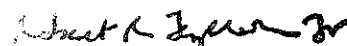
9 Work in regard to septic systems was performed by subcontractors, other independent  
10 contractors and/or design professionals, and said work included installation of septic tanks.  
11 Discovery and investigation are ongoing and as such, Responding Party reserves the right to  
12 supplement its response should additional information and/or documentation become available.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 83:**

14 Objection. Responding Party objects to this Special Interrogatory on the grounds that it is  
15 vague, ambiguous, overbroad, burdensome and oppressive. In addition, Responding Party objects  
16 to this Interrogatory on the grounds that it is vague, ambiguous, overbroad and uncertain as to  
17 "SUBJECT PROPERTY." Responding Party further objects to this Interrogatory on the grounds  
18 that it calls for an impermissible legal conclusion, seeks information which is protected by the  
19 attorney-client privilege and the attorney work product doctrine and seeks information which  
20 amounts to an impermissible request for expert discovery pursuant to *Code of Civil Procedure*  
21 §2034.210, *et seq.* In addition, Responding Party objects to this Interrogatory on the grounds that  
22 it seeks information not relevant to the subject matter of the action.

23 Dated: December 9, 2010

STUTZ, ARTIANO, SHINOFF & HOLTZ

24 

25 \_\_\_\_\_  
26 Robert R. Templeton, Jr., Esq.  
27 Attorneys for Cross-Defendant  
28 Defendants and Cross-Complainants,  
OUTDOOR RESORTS OF AMERICA, INC. and  
OUTDOOR RESORTS RANCHO CALIFORNIA,  
INC.

1 **RANCHO CALIFORNIA RV RESORT OWNERS ASSOC. v. OUTDOOR RESORTS OF**  
2 **AMERICA INC., et al.**

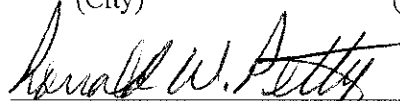
3 **VERIFICATION**

4 I, RONALD W. PETTY, President, for Outdoor Resorts of America, Inc., a Defendant  
5 in the above-captioned matter, hereby declare:

6 I have read the foregoing **DEFENDANT OUTDOOR RESORTS OF AMERICA, INC.'S**  
7 **RESPONSE TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET ONE)** and know the  
8 contents thereof. The matters stated therein are true to my own knowledge except as to those matters  
9 which are stated on information and belief, and as to those matters I believe them to be true.

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

12 Executed on December 7, 2012, at Baumont, California..  
13 (Date) (City) (State)

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15 \_\_\_\_\_  
16 Ronald W. Petty  
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STUTZ ARTIANO SHINOFF & HOLTZ  
A Professional Corporation

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OUTDOOR RESORTS OF AMERICA, INC. and  
OUTDOOR RESORTS RANCHO CALIFORNIA, INC.

**Rancho California RV Resort Owners Assoc. v. Outdoor Resorts Rancho CA, Inc., et al.**

Court Case No. RIC469533

Superior Court County of Riverside, State of California

HEARING DATE:      TIME: DEPT.:                      T/D:

**DECLARATION OF PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the county of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is: 3 Hutton Centre Drive, Suite 860, Santa Ana, California 92707. On December 9, 2010, I served the foregoing document described as **DEFENDANT OUTDOOR RESORTS OF AMERICA, INC.'S RESPONSE TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET ONE)** on the interested persons in this action by placing true copies thereof enclosed in sealed envelopes addressed as shown below:

**SEE ATTACHED SERVICE LIST**

   **BY MAIL** - I am "readily familiar" with the firm's practice of collection and processing documents for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at Santa Ana, California in the ordinary course of a business day. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing.

   **BY FAX** The facsimile machine I used complied with California Rules of Court, rule 2003 and no error was reported by machine. Pursuant to California Rules of Court, rule 2006(d), I caused the machine to print a transmission record of the transmission, a copy of which is attached to this declaration.

   **BY PERSONAL SERVICE** I caused certain envelope(s) to be personally served upon certain parties to the above action, particularly as referenced on the attached mailing list, on the date indicated below.

**XX**    **BY COURTLINK** On the date executed below, I served the document(s) via CourtLink described as **DEFENDANT OUTDOOR RESORTS OF AMERICA, INC.'S RESPONSE TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET ONE)** on designated recipients through electronic transmission of said documents, a certified receipt is issued to filing party acknowledging receipt by CourtLink's system. Once CourtLink has served all designated recipients, proof of electronic service is

returned to the filing party.

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

Executed on December 9, 2010, at Santa Ana, California.

  
\_\_\_\_\_  
Patricia Torres

*Rancho CA RV Resort Owners Assoc. v. Outdoor Resorts Rancho CA, Inc.*

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