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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

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Clerk of the Superior Court
By T. Cutts ,Deputy Clerk

Attorneys for Defendant City Heights
Community Development Corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

FATIMA ABDELRAHMAN, an individual;
NADIA ABDULRAHMAN, an individual;
NATALINA KANTIEKO, an individual, and;
IDZAI MUBAIWA, an individual,

Plaintiffs,

v.

CITY HEIGHTS COMMUNITY
DEVELOPMENT CORPORATION, a
California Non-Profit Corporation; and DOES 1-
50, inclusive,

Defendants.

And Related Cross-Actions

Case No.: 37-2024-00027594-CU-OR-CTL
[Consolidated Case – Subordinate Case is
37-2024-00010272-CL-MC-CTL]

NOTICE OF MOTION AND MOTION TO
COMPEL FURTHER PRODUCTION AND
RESPONSES FROM PLAINTIFF NATALINA
KANTIEKO TO DEFENDANT'S REQUEST
FOR PRODUCTION OF DOCUMENT, SET
NO. ONE, AND FURTHER RESPONSES TO
DEFENDANT'S SPECIAL
INTERROGATORIES, SET NO. ONE, AND
FORM INTERROGATORIES, GENERAL –
SET NO. ONE, AND REQUEST FOR
SANCTIONS IN THE AMOUNT OF \$4,570
AGAINST NATALINA KANTIEKO

Date: September 12, 2025

Time: 11:00 a.m.

Dept.: C-63

Judge: Hon. Katherine A. Bacal


Take notice that on September 12, 2025 at 11:00 a.m. or as soon thereafter that the matter may be heard in Department C-63 of the above-captioned court located at 330 West Broadway, San Diego, CA 92101, defendant CITY HEIGHTS COMMUNITY DEVELOPMENT CORPORATION (hereinafter "CHCDC") will, and does hereby, move this court for an order compelling plaintiff NATALINA KANTIEKO (hereinafter "Kantieko") to provide further responses and further production of documents to CHCDC's First Request for Production, and further responses to CHCDC's Special Interrogatories, Set No. One and Form Interrogatories – General, Set No. One, to

1 Plaintiff Natalina Kantieko, and for an order imposing sanctions in the amount of \$4,570 against
2 Plaintiff Kantieko.

3 This motion is made pursuant to Code of Civil Procedure 2030.300 and 2031.310, and on the
4 following grounds: (1) plaintiff Kantieko's verifications of the responses are improper and
5 ineffective; (2) the requests at issue seek documents and information within the permissible scope of
6 discovery; and (3) CHCDC incurred, and anticipates to further incur, attorneys' fees and costs in the
7 amount of \$4,570 to address this discovery and bring this motion.

8 This motion is based on this notice, the attached memorandum of points and authorities, the
9 attached declaration of James D. Crosby, the Separate Statement of Items in Dispute filed and served
10 concurrently herewith, the notice of lodgment and attachments thereto, the papers and records on file
11 in this motion, and on such other evidence and argument as may be presented at the hearing on this
12 motion.

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14 Date: July 15, 2025

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18 James D. Crosby
19 Attorney for Defendant, City Heights
20 Community Development Corporation
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