

1 James D. Crosby (State Bar No. 110383)
Tereza L. Callender (State Bar No. 351838)
2 Law Offices of James D. Crosby
550 West C Street, Suite 620
3 San Diego, California 92101
(619) 450-4149
4 Email: crosby@crosbyattorney.com
Email: tcallender@crosbyattorney.com

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
7/18/2025 11:18:45 PM
Clerk of the Superior Court
By R. Babers ,Deputy Clerk

6 Attorneys for Defendant City Heights
Community Development Corporation

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

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

12
13 Plaintiffs,

14 v.

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

18 Defendants.

19 And Related Cross-Actions

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

SEPARATE STATEMENT OF ITEMS IN
DISPUTE ISO MOTION TO COMPEL
RESPONSES FROM PLAINTIFF FATIMA
ABDELRAHMAN TO DEFENDANT'S
SPECIAL INTERROGATORIES, SET NO.
TWO, REQUEST FOR SANCTIONS IN THE
AMOUNT OF \$4,175 AGAINST FATIMA
ABDELRAHMAN AND ATTORNEY
CARDIFF

Date: September 12, 2025
Time: 11:00 a.m.
Dept.: C-63
Judge: Hon. Katherine A. Bacal

20
21 SEPARATE STATEMENT OF ITEMS IN DISPUTE

22 SPECIAL INTERROGATORY NO. 124:

23 Identify by name, last known address, and last known telephone number each and every
24 individual who translated and/or assisted in translating the Verified Complaint for Forcible Detainer
25 (Unlawful Eviction) filed in San Diego Superior Court Case No. 37-2024-000120272-CL-MC-
26 CTL, on March 4, 2024 for you for the purposes of your executing the verification of said document.

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1 Response to Special Interrogatory No. 124:

2 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
3 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
4 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

5 **Reasons Why Further Response is Needed:**

6 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
7 separate statement of items in dispute.

8 The discovery at issue is relevant because it properly explores the evidentiary foundation for
9 Abdelrahman's numerous statements made "under oath" and because it may establish that
10 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
11 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
12 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
13 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
14 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

15 SPECIAL INTERROGATORY NO. 125:

16 Identify by name, last known address, and last known telephone number each and every
17 individual who translated and/or assisted in translating the Declaration of Fatima Abdelrahman in
18 Support of Ex Parte Application for OSC Re Preliminary Injunction and Temporary Restraining
19 Order, filed in San Diego Superior Court Case No. 37-2024-00010272-CL-MC-CTL, on March 11,
20 2024, for you for the purposes of executing the declaration under penalty of perjury therein.

21 Response to Special Interrogatory No. 125:

22 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
23 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
24 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

25 **Reasons Why Further Response is Needed:**

26 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
27 separate statement of items in dispute.

28

1 The discovery at issue is relevant because it properly explores the evidentiary foundation for
2 Abdelrahman’s numerous statements made “under oath” and because it may establish that
3 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
4 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
5 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
6 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
7 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

8 SPECIAL INTERROGATORY NO. 126:

9 Identify by name, last known address, and last known telephone number each and every
10 individual who translated and/or assisted in translating the Declaration of Fatima Abdelrahman ISO
11 Motion to Intervene, filed in San Diego Superior Court Case No. 37-2024-0009788-CU-MC-CTL,
12 on May 24, 2024, for you for the purposes of executing the declaration under penalty of perjury
13 therein.

14 Response to Special Interrogatory No. 125:

15 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
16 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
17 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

18 **Reasons Why Further Response is Needed:**

19 Defendant refers to it’s Memorandum of Points and Authorities concurrently filed with this
20 separate statement of items in dispute.

21 The discovery at issue is relevant because it properly explores the evidentiary foundation for
22 Abdelrahman’s numerous statements made “under oath” and because it may establish that
23 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
24 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
25 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
26 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
27 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

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1 SPECIAL INTERROGATORY NO. 127:

2 Identify by name, last known address, and last known telephone number each and every
3 individual who translated and/or assisted in translating the Complaint for Declaratory Relief,
4 Injunctive Relief, Recission, and Damages, filed in San Diego Superior Court Case No. 37-2024-
5 00027594-CU-OR-CTL, on June 12, 2024, for you for the purpose of your executing the verification
6 of said document.

7 Response to Special Interrogatory No. 127:

8 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
9 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
10 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

11 **Reasons Why Further Response is Needed:**

12 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
13 separate statement of items in dispute.

14 The discovery at issue is relevant because it properly explores the evidentiary foundation for
15 Abdelrahman's numerous statements made "under oath" and because it may establish that
16 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
17 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
18 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
19 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
20 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

21 SPECIAL INTERROGATORY NO. 128:

22 Identify by name, last known address, and last known telephone number each and every
23 individual who translated and/or assisted in translating the First Amended Complaint for Declaratory
24 Relief; Quiet Title Through Adverse Possession; Injunctive Relief and Damages, filed in San Diego
25 Superior Court Case No. 37-2024-00027594-CU-OR-CTL, on August 15, 2024, for you for the
26 purpose of your executing the verification of said document.

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1 Response to Special Interrogatory No. 128:

2 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
3 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
4 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

5 **Reasons Why Further Response is Needed:**

6 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
7 separate statement of items in dispute.

8 The discovery at issue is relevant because it properly explores the evidentiary foundation for
9 Abdelrahman's numerous statements made "under oath" and because it may establish that
10 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
11 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
12 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
13 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
14 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

15 SPECIAL INTERROGATORY NO. 129:

16 Identify by name, last known address, and last known telephone number each and every
17 individual who translated and/or assisted in translating the Second Amended Complaint for
18 Declaratory Relief, Equitable Relief, and Damages, filed in San Diego Superior Court Case No. 37-
19 2024-00027594-CU-OR-CTL, on November 18, 2024, for you for the purpose of your executing the
20 verification of said document.

21 Response to Special Interrogatory No. 129:

22 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
23 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
24 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

25 **Reasons Why Further Response is Needed:**

26 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
27 separate statement of items in dispute.

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1 The discovery at issue is relevant because it properly explores the evidentiary foundation for
2 Abdelrahman’s numerous statements made “under oath” and because it may establish that
3 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
4 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
5 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
6 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
7 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

8 SPECIAL INTERROGATORY NO. 130:

9 Identify by name, last known address, and last known telephone number each and every
10 individual who translated and/or assisted in translating the Responses to Request for Production, Set
11 No. 1, served on August 23, 2024, in San Diego Superior Court Case No. 37-2024-00010272-CL-
12 MC-CTL, for you for the purpose of your executing the verification of said document.

13 Response to Special Interrogatory No. 130:

14 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
15 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
16 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

17 **Reasons Why Further Response is Needed:**

18 Defendant refers to it’s Memorandum of Points and Authorities concurrently filed with this
19 separate statement of items in dispute.

20 The discovery at issue is relevant because it properly explores the evidentiary foundation for
21 Abdelrahman’s numerous statements made “under oath” and because it may establish that
22 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
23 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
24 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
25 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
26 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

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1 SPECIAL INTERROGATORY NO. 131:

2 Identify by name, last known address, and last known telephone number each and every
3 individual who translated and/or assisted in translating Plaintiff Fatima Abdelrahman’s Response to
4 Form Interrogatories – General, served on September 26, 2024, in San Diego Superior Court Case
5 No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the verification of
6 said document.

7 Response to Special Interrogatory No. 131:

8 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
9 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
10 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

11 **Reasons Why Further Response is Needed:**

12 Defendant refers to it’s Memorandum of Points and Authorities concurrently filed with this
13 separate statement of items in dispute.

14 The discovery at issue is relevant because it properly explores the evidentiary foundation for
15 Abdelrahman’s numerous statements made “under oath” and because it may establish that
16 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
17 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
18 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
19 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
20 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

21 SPECIAL INTERROGATORY NO. 132:

22 Identify by name, last known address, and last known telephone number each and every individual
23 who translated and/or assisted in translating Plaintiff Fatima Abdelrahman’s Responses to Special
24 Interrogatories, served on March 14, 2025, in San Diego Superior Court Case No. 37-2024-
25 00027594-CU-OR-CTL, for you for the purpose of your executing the verification of said document.

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1 Response to Special Interrogatory No. 132:

2 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
3 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
4 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

5 **Reasons Why Further Response is Needed:**

6 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
7 separate statement of items in dispute.

8 The discovery at issue is relevant because it properly explores the evidentiary foundation for
9 Abdelrahman's numerous statements made "under oath" and because it may establish that
10 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
11 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
12 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
13 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
14 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

15 SPECIAL INTERROGATORY NO. 133:

16 Identify by name, last known address, and last known telephone number each and every
17 individual who translated and/or assisted in translating Responses of Plaintiff Fatima Abdelrahman
18 to Defendants Request for Production No. 1, served on March 14, 2025, in San Diego Superior Court
19 Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the
20 verification of said document.

21 Response to Special Interrogatory No. 133:

22 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
23 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
24 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

25 **Reasons Why Further Response is Needed:**

26 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
27 separate statement of items in dispute.

28

1 The discovery at issue is relevant because it properly explores the evidentiary foundation for
2 Abdelrahman’s numerous statements made “under oath” and because it may establish that
3 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
4 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
5 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
6 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
7 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

8 SPECIAL INTERROGATORY NO. [134]:

9 Identify by name, last known address, and last known telephone number each and every
10 individual who translated and/or assisted in translating Plaintiff Fatima Abdelrahman’s
11 Supplemental Responses to Special Interrogatories, served on June 10, 2025, in San Diego Superior
12 Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the
13 verification of said document.

14 Response to Special Interrogatory No. 134:

15 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
16 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
17 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

18 **Reasons Why Further Response is Needed:**

19 Defendant refers to it’s Memorandum of Points and Authorities concurrently filed with this
20 separate statement of items in dispute.

21 The discovery at issue is relevant because it properly explores the evidentiary foundation for
22 Abdelrahman’s numerous statements made “under oath” and because it may establish that
23 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
24 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
25 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
26 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
27 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

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1 SPECIAL INTERROGATORY NO. [135]:

2 Identify by name, last known address, and last known telephone number each and every
3 individual who translated and/or assisted in translating Plaintiff Fatima Abdelrahman's
4 Supplemental Responses to Defendant's Request for Production No. 1, served on June 10, 2025, in
5 San Diego Superior Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of
6 your executing the verification of said document.

7 Response to Special Interrogatory No. 135:

8 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
9 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
10 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

11 **Reasons Why Further Response is Needed:**

12 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
13 separate statement of items in dispute.

14 The discovery at issue is relevant because it properly explores the evidentiary foundation for
15 Abdelrahman's numerous statements made "under oath" and because it may establish that
16 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
17 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
18 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
19 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
20 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

21 SPECIAL INTERROGATORY NO. [136]:

22 Identify by name, last known address, and last known telephone number each and every
23 individual who translated and/or assisted in translating Plaintiffs' Responses to Form Interrogatories,
24 Set No. 2, served on June 10, 2025, in San Diego Superior Court Case No. 37-2024-00027594-CU-
25 OR-CTL, for you for the purpose of your executing the verification of said document.

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1 Response to Special Interrogatory No. 136:

2 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
3 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
4 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

5 **Reasons Why Further Response is Needed:**

6 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
7 separate statement of items in dispute.

8 The discovery at issue is relevant because it properly explores the evidentiary foundation for
9 Abdelrahman's numerous statements made "under oath" and because it may establish that
10 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
11 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
12 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
13 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
14 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

15 SPECIAL INTERROGATORY NO. [137]:

16 Identify by name, last known address, and last known telephone number each and every
17 individual who translated and/or assisted in translating CH-100 Request for Civil Harassment
18 Restraining Orders, filed on December 18, 2023, in San Diego Superior Court Case No. 37-2023-
19 00054449-CU-HR-CTL, for you for the purposes of executing the declaration under penalty of
20 perjury therein.

21 Response to Special Interrogatory No. 137:

22 OBJECTIONS: Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
23 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
24 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

25 **Reasons Why Further Response is Needed:**

26 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
27 separate statement of items in dispute.

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1 The discovery at issue is relevant because it properly explores the evidentiary foundation for
2 Abdelrahman’s numerous statements made “under oath” and because it may establish that
3 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
4 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
5 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
6 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
7 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

8 SPECIAL INTERROGATORY NO. [138]:

9 Identify by name, last known address, and last known telephone number each and every
10 individual who translated and/or assisted in translating MC-030 Declaration of Fatima Abdelrahman,
11 filed on December 18, 2023, in San Diego Superior Court Case No. 37-2023-00054449-CU-
12 HRCTL, for you for the purposes of executing the declaration under penalty of perjury therein.

13 Response to Special Interrogatory No. 138:

14 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
15 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
16 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

17 **Reasons Why Further Response is Needed:**

18 Defendant refers to it’s Memorandum of Points and Authorities concurrently filed with this
19 separate statement of items in dispute.

20 The discovery at issue is relevant because it properly explores the evidentiary foundation for
21 Abdelrahman’s numerous statements made “under oath” and because it may establish that
22 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements “under
23 oath” in this case. Plaintiff’s “exceeds maximum number of interrogatory” objection is without merit
24 and is ineffective. Defendant’s Special Interrogatories, Set No. Two were supported by a declaration
25 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
26 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

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1 SPECIAL INTERROGATORY NO. [139]:

2 Identify by name, last known address, and last known telephone number each and every
3 individual who translated and/or assisted in translating MC-031 Declaration of Fatima Abdelrahman,
4 filed on December 18, 2023, in San Diego Superior Court Case No. 37-2023-00054449-CU-HR-
5 CTL, for you for the purposes of executing the declaration under penalty of perjury therein.

6 Response to Special Interrogatory No. 139:

7 **OBJECTIONS:** Lacks Relevance - not reasonably calculated to lead to admissible evidence. (Evid.
8 Code sect. 350, Code Civ. Proc. sect. 2017.010.) Exceeds maximum number of interrogatories
9 without good cause. (Code Civ. Proc. sect. 2030.030, 2030.040(b).)

10 **Reasons Why Further Response is Needed:**

11 Defendant refers to it's Memorandum of Points and Authorities concurrently filed with this
12 separate statement of items in dispute.

13 The discovery at issue is relevant because it properly explores the evidentiary foundation for
14 Abdelrahman's numerous statements made "under oath" and because it may establish that
15 Abdelrahman has repeatedly lied and/or committed perjury in executing numerous statements "under
16 oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit
17 and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration
18 as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this
19 filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

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21 Date: July 18, 2025

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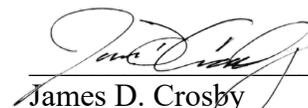
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James D. Crosby
Attorney for Defendant, City Heights
Community Development Corporation