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Superior Court of California,  
County of San Diego  
7/18/2025 11:18:45 PM

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

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]

POINTS AND AUTHORITIES IN SUPPORT  
OF MOTION TO COMPEL RESPONSES  
FROM PLAINTIFF NATALINA KANTIEKO  
TO DEFENDANT'S SPECIAL  
INTERROGATORIES, SET NO. TWO, AND  
REQUEST FOR SANCTIONS IN THE  
AMOUNT OF \$4,175 AGAINST NATALINA  
KANTIEKO AND ATTORNEY CARDIFF.

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

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1       **I. Introduction**

2           Plaintiff Natalina Kantieko (“Kantieko” or “plaintiff”) claims that she cannot read English.  
3 When deposed, she has required the presence of a certified translator to translate questions and her  
4 answers from her native dialect to English. Despite her claimed inability to read English, plaintiff  
5 Kantieko has verified, under oath, on numerous occasions, pleadings, declarations, and discovery  
6 responses, all written in English, attesting, in several different versions of verifications, that she  
7 reviewed the documents and same are true and correct. Obviously, she could not have reviewed the  
8 subject English language documents so as to allow her to verify and attest under oath that they are  
9 true and correct because she cannot read English. At times, Kantieko claims to have had the subject  
10 documents translated by her daughter or family members for the purposes of verification. But,  
11 defendant knows next to nothing about the translators<sup>1</sup>, who they are, whether they are qualified to  
12 translate English documents in the required dialect, whether they have the ability to accurately  
13 translate English documents in the required dialect, the nature of their relationships with the plaintiff,  
14 whether they are biased in favor of plaintiff in this matter, whether they are otherwise witnesses to  
15 events in this case, whether the documents were actually translated in whole or in part, the method  
16 and manner of such claimed translations, whether any such claimed translations were general in  
17 nature or detailed and specific, or even the time taken to translate the documents.<sup>2</sup> These items  
18 represent the evidentiary foundation for the numerous verifications signed by plaintiff Kantieko  
19 under oath in the case. Defendant City Heights Community Development Corporation (“CHCDC”)  
20 is clearly entitled to investigate and undertake discovery into that evidentiary foundation. Defendant  
21 is clearly entitled to investigate and undertake discovery into whether plaintiff Kantieko has been

22 \_\_\_\_\_  
23 <sup>1</sup> With the exception of, perhaps, Sahar Abdelrahman ("Sahar"). If Sahar in fact claims to have translated documents for  
24 her plaintiff mother to verify, that would be highly problematic. Sahar is a principal witness in this case. She is fierce  
25 advocate for her mother and was a significant motivating agent behind much of what transpired in the case. She has no  
26 business purporting to act as an unbiased translator of documents for her mother to verify. Because of her obvious and  
27 fully understandable bias towards her mother, she would be completely incapable of performing that function.

28 <sup>2</sup> For example, plaintiff's verified second amended complaint, is 25 pages long and contains 170 paragraphs of  
allegations, only 19 of which are alleged on information and belief. ROA #59. Plaintiff attested under oath to the truth  
and correctness of all of those allegations, but she cannot read them. If the pleading was in fact translated, was it  
translated in writing, was it translated in a generalized fashion or in a specific paragraph by paragraph fashion, was the  
translator are qualified to translate English documents in the required dialect, did the translator have the ability to  
accurately translate English documents in the required dialect, was the translator biased for plaintiff, etc?

1 and is lying under oath and/or committing perjury on a broad scale in this case when she repeatedly  
2 verifies as true and correct, under oath, various documents she claims she cannot read.

3 Special Interrogatories (“SROG”), Set No. Two, the discovery which is the subject of this  
4 motion, seeks names and contact information for the claimed translators of various specifically  
5 identified pleadings, declarations, and discovery responses verified by Kantieko. Plaintiff’s counsel  
6 responded with objections only. Defendant CHCDC moves to compel and for sanctions.

7 The Court should grant this motion, order Kantieko to provide responses and impose  
8 sanctions against Abdulrahman and her counsel because (1) the requests at issue seek relevant  
9 information within the permissible scope of discovery and (2) CHCDC incurred, and anticipates to  
10 further incur, attorneys’ fees and costs in the amount of \$4,175.

## 11 **II. Factual Background**

12 On June 13, 2025, defendant CHCDC propounded Special Interrogatories ("SROG"), Set No.  
13 Two, on Kantieko. NOL Ex. 1; JDC Dec. ¶4. SROG, Set No. Two, consists of ten interrogatories,  
14 requesting the name, address, and telephone number for the individuals who translated various  
15 specifically identified “verified” pleadings, declarations and discovery requests. NOL Ex.1; JDC  
16 Dec. ¶4.

17 On June 13, 2025, plaintiff’s counsel stated that his “clients would not be responding to the  
18 discovery.” NOL Ex. 2; JDC Dec. ¶5. Meet and confer efforts at this juncture were unsuccessful.  
19 NOL Ex. 2; JDC Dec. ¶6.

20 On July 11, 2025, Kantieko responded to CHCDC’s SROGs, Set No. Two, providing  
21 objection-only responses. NOL Ex. 3; JDC Dec. ¶7. On July 14, 2025, counsel for CHCDC sent an  
22 email, addressing the lack of merit in the lodged objections. NOL Ex. 4; JDC Dec. ¶8. Plaintiffs’  
23 counsel disagreed in response. NOL Ex. 4; JDC Dec. ¶8. On July 16, 2025, counsel for CHCDC sent  
24 a further detailed response, explaining the significance of, and the ramifications of, this translation  
25 issue. NOL Ex. 4; JDC Dec. ¶9. Plaintiff’s counsel derisively responded, claiming in part that this  
26 discovery "is clearly not about the merits, and instead of about making the discovery process as  
27 expensive and oppressive as possible..." NOL Ex. 4; JDC Dec. ¶10. There was no resolution of the  
28 objections. NOL Ex. 4; JDC Dec. ¶11.

1 This Court has addressed this translation issue several times in this case, formally in  
2 discovery motions and in a motion to strike, and informally during at least two informal discovery  
3 conferences. JDC Dec. ¶12. The Court has made clear that it views this translation issue as an  
4 evidentiary matter and has thereby, in defendant's view, acknowledged the inevitability and necessity  
5 of this discovery. JDC Dec. ¶12. For example, in ruling on CHCDC's Motion to Strike, the court  
6 was unable to strike the verification as "false" under Cal. Civ. Proc. §436 because there was no  
7 indication as to whether the "verified" pleading had been translated to Abdulrahman or not. ROA  
8 #122. Further, the undersigned counsel has on numerous occasions and for months addressed the  
9 appropriateness and necessity of this discovery with plaintiff's counsel without success. JDC Dec.  
10 ¶13.

### 11 **III. Legal Authority on a Motion to Compel**

12 Cal. Civ. Proc. Code §2030.300 provides, in pertinent part, that:

13 On receipt of a response to the interrogatories, the propounding party may move for an order  
14 compelling a further response if the propounding party deems that any of the following  
apply:

- 15 (1) An answer to a particular interrogatory is evasive or incomplete
- 16 (2) An exercise of the option to produce documents under Section 2030.230 is unwarranted  
or the required specification of those documents is inadequate.
- (3) An objection to an interrogatory is without merit or too general.

17 California's discovery procedures are designed to minimize the opportunities for fabrication  
18 and forgetfulness, and to eliminate the need for guesswork about the other side's evidence, with all  
19 doubts about discoverability resolved in the favor of disclosure. *Glenfed Dev. Corp. v. Superior*  
20 *Court* (1997) 53 Cal.App.4<sup>th</sup> 1113, 1119. "[A]ny party may obtain discovery regarding any matter,  
21 not privileged, that is relevant to the subject matter involved in the pending action... if the matter  
22 either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of  
23 admissible evidence." Cal. Civ. Proc. §2017.010. "This right includes an entitlement to learn 'the  
24 identity and location of persons having knowledge of any discoverable matter.'" *Williams v.*  
25 *Superior Court* (2017) 3 Cal.5<sup>th</sup> 531, 541, quoting Cal. Civ. Proc. §2017.010. Verified responses to  
26 discovery requests are admissible evidence. *Melendres v. Superior Court* (2013) 215 Cal.App.4<sup>th</sup>  
27 1343, 1349.

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#### IV. Argument

##### A. The Discovery at Issue is Relevant Because it Properly Explores the Evidentiary Foundation for Kantieko's Numerous Statements Made "Under Oath"

The requests at issue seek the name, address, and last known phone number of the "translators" allegedly or presumably utilized by Kantieko for the purposes of verifying, or signing under oath, various pleadings, declarations and discovery responses. This information is not privileged. Kantieko's verified discovery responses, pleadings, and declarations, all signed "under oath" are **evidence**. They are **party admissions** and can be used at trial as direct proof and for impeachment purposes. Absent proper verifications, accounting for a translator that was presumably utilized, including a declaration of a certified translator utilized, describing how the discovery responses were translated, and stating that they were translated truthfully, there is a substantial risk that this evidence will be rendered meaningless and useless for defendant at trial.

If and when one of Kantieko's "verified" pleadings or discovery responses, or declarations signed "under penalty of perjury", is used as proof or for impeachment purposes at trial, Kantieko can now simply say that the document was translated differently to her or that she didn't understand it to mean what it says. As such, without discovery into the means, methods, adequacy of, and completeness of the translations undertaken (or not undertaken) in this case, Attorney Cardiff and plaintiff Kantieko, hold an unfair advantage, prejudicial to defendant, of being able to undercut the evidentiary foundation for plaintiff's own judicial admissions and prior inconsistent statements if and when the need arises. To posit a hypothetical cross-examination at trial, with a certified in-court translator, could go as follows:

Q: Ms. Kantieko, you stated in your direct testimony that XYZ happened on January 21 at the farm, correct?

A: Yes.

Q: That's your testimony under oath today in this courtroom, correct?

A: Yes.

Q: I set before you your declaration dated ### and ask you to look at paragraph ## of your declaration. Do you see that?

1 A: Yes.

2 Q: Please read that paragraph out loud to the jury.

3 A: “XYZ did not happen on January 21.”

4 Q: You signed that declaration under oath, correct?

5 A: Yes.

6 Q: And what you said in that under oath declaration is different to what you testified to

7 today, correct?

8 A: Uh, I don’t know.

9 Q: Well, here today in court you stated under oath that XYZ happened at the farm on

10 January 21, right?

11 A: Yes.

12 Q: But, in your prior declaration signed under oath you stated that XYZ did not happen

13 at that farm on January 21, right?

14 A: Yes, that is what it says. But it was not translated to me that way. I never would have

15 said that. It was not translated properly.

16 With this, Kantieko could effectively undercut the evidentiary foundation for her own prior

17 inconsistent statement and concurrently undercut defendant’s ability to challenge her credibility

18 based upon that prior inconsistent statement, by blaming the translator for a bad translation. It would

19 also undercut defendant’s ability to effectively use the statement as proof that “XYZ” did not happen

20 at the farm on January 21. Cal. Evid. Code §1235 (prior inconsistent statements are an exception to

21 the hearsay rule, admitted for the truth of the matter asserted). Defendants would have no ability to

22 challenge Kantieko using the claimed “translator error” to undercut her own prior inconsistent

23 statement.

24 Conversely, if defendant had the ability to identify the translators used, which the discovery

25 at issue requests, depose them, and investigate the evidentiary foundation of the translations

26 Kantieko relied on, defendant could counter that effort by Kantieko to undercut her own prior

27 inconsistent statement. Cross-examination at trial, with a certified in-court translator, could

28 hypothetically continue as follows:



1 Q: But, Ms. Kantieko, we deposed the translator, your daughter. She testified that  
2 she had translated every paragraph of that declaration verbatim, and in writing, and  
3 that you reviewed and approved the verbatim translations. Did you know that?

4 A: Uh.

5 Q: And the translator, your daughter, testified under oath that, based on her accurate  
6 translation efforts, she had no doubt that you understood, when you signed the  
7 verification, that paragraph ## of the declaration said that “XYZ did not happen on  
8 January 21.” Did you know that?

9 A: Uh.

10 Then, defendant could call the translator to testify to the above based on her deposition  
11 testimony. Defendants could then argue to the jury that Kantieko lied in court when she testified that  
12 “XYZ happened on January 21 at the farm” and then lied again when she claimed that the  
13 declaration was translated to her improperly. If defendant is denied the right to identify and depose  
14 the translators and to investigate the evidentiary foundations for plaintiffs’ statements under oath,  
15 plaintiffs will unfairly retain a powerful tool to effectively undercut defendant’s ability to utilize  
16 plaintiff’s own prior statements against her. That would be unfair, and highly prejudicial, to  
17 defendant.

18 The discovery at issue seeks highly relevant evidence and addresses a basic unfairness in the  
19 manner in which plaintiffs’ counsel seeks to mold and manipulate evidence to provide plaintiff with  
20 an unfair evidentiary advantage at trial. The hypothetical examples above illustrate the seriousness of  
21 the issue for plaintiff, and potentially for plaintiff’s counsel, at trial. This translator issue goes  
22 directly to the plaintiff’s veracity, the truthfulness of her under-oath statements, and the seriousness  
23 with which she takes her obligation to testify truthfully under oath, or their lack thereof.

24 B. The Discovery at Issue is Relevant Because it May Establish that Kantieko Has  
25 Repeatedly Lied and/or Committed Perjury In Executing Numerous Statements “Under  
26 Oath” In This Case

27 Kantieko has utilized various *inconsistent* versions of “verifications”, or “under oath”  
28 attestations in declarations, in this case. For example, Kaniteko’s responses to defendant’s Special

Interrogatories, Set No. One, and Requests for Production (“RFP”), Set No. One, as well as her supplemental responses thereto, state:

I, Natalina Kantieko, declare: **I have reviewed the above responses to discovery.** I declare under penalty of perjury under the laws of the State of California that the foregoing responses are true and correct, except for statements made on information and belief and as to such statements, I believe them to be true.

NOL Ex. 5, JDC Dec. ¶14; NOL Ex. 6, JDC Dec. ¶15

Yet, the following different language was utilized to “verify” her responses to defendant’s Form Interrogatories – General, Set No. One:

I, Natalina Kantieko, declare: **I have reviewed the above responses to discovery with the help of my daughter translating.** I declare under penalty of perjury under the laws of the State of California that the foregoing responses are true and correct, except for statements made on information and belief and as to such statements, I believe them to be true.<sup>3</sup>

NOL Ex. 7, JDC Dec. ¶16. These two examples of “verifications” utilized by Kantieko are contradictory and cannot both be true – Kantieko was either able to review the responses, period, or she needed the assistance of her daughter to do so.

“With the help of my daughter translating” Verifications

The “With the help of my daughter translating” verification version utilized by plaintiff Kantieko is problematic because there is no evidence thus far of the identity of the alleged translator, whether she is certified and is therefore under obligation to comply with the methods and means of translation required by the California Rules of Court and Evidence Code, whether she translated the document at issue truthfully, whether she is impartial, unbiased, and/or whether she has a vested

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<sup>3</sup> Plaintiff Kantieko’s Form Interrogatory responses were accompanied by a “declaration” by her daughter, Joice Thomas stating she made a “true **interpretation**” of the responses. NOL Ex. 7; JDC Dec. ¶16. However, as stated herein, defendant knows nothing about how Ms. Ahmad made the claimed translation, whether it was translated generally or line-by-line, whether Ms. Ahmad is unbiased, whether she has taken an oath to translate truthfully, whether she is qualified or certified to translate, what language the responses were translated to/from, etc. It is insufficient.

1 interest in the outcome of the case, how the document at issue was translated (i.e. line-by-line or just  
2 through general statements), or whether the document at issue was even translated at all. See Cal.  
3 Evid. Code §751(a) (requiring that interpreters “take and **oath** that he or she will make a true  
4 interpretation of the witness’ answers to questions to counsel, court or jury, in the English language,  
5 with his or her best skill or judgment.” See also Cal. Evid. Code §751(c) (requiring that “[a]  
6 translator shall take an **oath** that he or she will make a true translation in the English language of any  
7 writing her or she is to decipher or translate.”) See also Cal. Rule of Court 2.890(a) (requiring that an  
8 “interpreter must accurately and **completely** represent his or her certifications, and relevant  
9 experience.”), subd. (c)(1) (requiring that translators must be “**impartial and unbiased** and must  
10 refrain from conduct that may give an appearance of bias.”), and subd. (c)(2) (requiring that an  
11 interpreter “disclose to the judge and to all parties any actual or apparent conflict of interest... A  
12 conflict may exist if the interpreter is acquainted with or related to any witness or party to the action  
13 or if the interpreter has an interest in the outcome of the case.”).

14 “I have reviewed the above responses” Verifications

15 Plaintiffs’ counsel, Attorney Cardiff, has stated, in his own declaration(s) and  
16 communications, that plaintiff Kantioko cannot speak or read English. NOL Ex. 8; JDC Dec. ¶17.  
17 Abdulrahman has stated, in numerous “verified” pleadings and documents, that she cannot read or  
18 speak English. ROA #59 CSAC ¶¶18, 125, 132, 138; NOL Ex. 7 [FROG Nos. 2.9-2.10] JDC Dec.  
19 ¶16. As such, it is unclear how Kantioko’s responses to CHCDC’s SROGs and RFPs, written in  
20 English, could have been reviewed by Kantioko so as to allow her to verify and attest under oath that  
21 they are true and correct. Furthermore, it is unclear how Kantioko’s responses to CHCDC’s FROGs,  
22 written in English, could have been reviewed by, or read or communicated to, Kantioko. The  
23 inconsistencies in Kantioko’s verifications highlighted above raise the obvious question – if  
24 Kantioko needed her daughter’s assistance in translating the responses to FROGs, and her counsel  
25 attests that she cannot read or speak English, how can her standard verifications of her responses to  
26 the RFPs and SROGs be deemed valid and truthful? They simply cannot.

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1        Evidence of Perjury

2        Further, simply stating that Kantieko's "daughter" "assisted" in "translating" or  
3 "interpreting" responses, by unidentified means, is not sufficient. Likewise, simply stating that she  
4 "reviewed" the responses written in English, when she has declared that she does not read or speak  
5 English, is improper, at best, and/or possibly perjurious. Defendants are entitled to develop evidence  
6 that Kantieko's "under oath" statements were translated improperly or not translated to her at all and  
7 that, therefore, she has committed perjury by signing these various "verifications" and  
8 "declarations".

9        If defendants are able to identify and depose the claimed translators, and it turns out that  
10 particular pleadings, declarations, and/or discovery responses Kantieko "verified", or parts thereof,  
11 were not translated, fully or at all, defendant could effectively argue that Kantieko lied under oath  
12 and/or committed perjury on a broad scale in this case when "verifying" those pleadings,  
13 declarations, and/or discovery responses "under oath."<sup>4</sup> Defendant could then argue that because  
14 Kantieko repeatedly lied in her "under-oath" verifications, she should not be believed as to any of her  
15 testimony. CACI No. 107.

16        This issue also puts plaintiff in an evidentiary bind of her, or her counsel's, own making. If,  
17 upon discovery, it is determined that the claimed translations were actually undertaken and done so  
18 in an accurate, unbiased, and precise manner, then plaintiff cannot, at trial, walk away from her prior  
19 under oath statements in the translated document without being impeached with those prior  
20 inconsistent under oath statements. Conversely, if, upon discovery, it is determined that the claimed  
21 translations were not actually undertaken or, if undertaken, were done so in a generalized,  
22 inaccurate, biased, and/or imprecise manner, then the truthfulness of plaintiff's verifications of the  
23 translated documents is directly called into question.<sup>5</sup> This **directly** illustrates the need for discovery

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26        <sup>4</sup> If evidence is developed that particular pleadings, declarations, and/or discovery responses "verified" by plaintiffs, or  
27 part thereof, were not translated fully or at all, and plaintiffs' counsel knew about that, plaintiffs' counsel may have been  
suborning perjury by having his clients sign verifications he knew, or should have known, were not true.

28        <sup>5</sup> If a pleading or a declaration was not actually translated, or was translated in a generalized, inaccurate, biased, and/or  
imprecise manner, how could plaintiff truthfully attest to truthfulness and correctness of that document in a verification?

1 into the evidentiary foundations for the claimed translations of the declarations, pleadings, and  
2 discovery responses plaintiff has verified, or attested to under oath, in this case.

3 This translator issue has been exacerbated by the fact that plaintiffs' claimed translators are  
4 biased family members, one of whom (Fatima Abdelrahman's daughter, Sahar) plaintiffs' counsel  
5 has directly represented as a witness in this matter.<sup>6</sup> None of this would be at issue if plaintiffs'  
6 counsel has secured the assistance of a certified, un-biased, translator and had him or her approved  
7 by the Court for translations in this case. In fact, plaintiffs' counsel has exacerbated this issue by  
8 continuing to utilized biased family members, with a vested interest in the outcome of the case, as  
9 uncertified translators and, in doing so, has increasingly placed his own clients at risk for charges of  
10 perjury.

11 C. Plaintiffs' "Exceeds Maximum Number of Interrogatory" Objection is Without Merit and  
12 Ineffective

13 Cal. Civ. Proc. §2030.040(a) states, in relevant part, "[s]ubject to the right of the responding  
14 party to seek a protective order under Section 2030.090, any party who attaches a supporting  
15 declaration as described in Section 2030.050 may propound a greater number of specially prepared  
16 interrogatories... if this greater number is warranted" under particular circumstances. If the  
17 responding party believes that the number of specially prepared interrogatories is unwarranted, the  
18 responding party is to seek a protective order. *Id.*, subd. (b). "When interrogatories have been  
19 propounded, the responding party... may **promptly move for a protective order.**" Cal. Civ. Proc.  
20 §2030.090.

21 CHCDC's SROGs, Set No. Two, the discovery at issue in this motion was propounded on  
22 June 13, 2025. NOL Ex. 1; JDC Dec. ¶4. CHCDC's SROG Set No. Two is supported by a  
23 declaration pursuant to Cal. Civ. Proc. §2030.040(a) and §2030.050. NOL Ex. 1; JDC Dec. ¶4. The  
24 same day the interrogatories were served, plaintiffs' counsel responded stating that his "clients will  
25 not be responding to the discovery." NOL Ex. 2; JDC Dec. ¶5. On June 18, 2025, plaintiff's counsel  
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27 <sup>6</sup> If plaintiffs' counsel represents the translators in their depositions, as he has done in the past (Sahar) and as it is  
28 suspected he will continue to do, there will be obvious conflicts of interest in such representations.

1 stated his intention to move for a protective order. NOL Ex. 2; JDC Dec. ¶6. As of the date of this  
2 filing, plaintiffs have not filed a motion for protective order. JDC Dec. ¶18. Instead, plaintiffs’  
3 counsel objected to SROG, Set No. Two, with the following objection: “Exceeds maximum number  
4 of interrogatories without good cause. (Code Civ. Proc. Sect. 2030.030, 2030.040(b).)” NOL Ex. 3;  
5 JDC Dec. ¶7. Plaintiffs’ counsel’s objection is without merit and is ineffective. If plaintiff wants to  
6 challenge the number of interrogatories propounded and be relieved from her obligation to respond  
7 to the discovery at issue, she was required to timely file a motion for protective order. As of this  
8 filing, she has not done so.

#### 9 **V. Sanctions Are Appropriate**

10 Unless this court determines that Kantioko acted with substantial justification in providing  
11 objection-only responses to CHCDC’s SROGs, Set No. Two, or in opposing this motion, this court  
12 must impose sanctions. Cal. Civ. Proc. Code §2031.310(h). Kantioko failed to provide any responses  
13 to this discovery, which is highly relevant and was necessary due to the manner in which plaintiffs’  
14 counsel has proceeded in this case. Counsel for CHCDC has put plaintiffs’ counsel on notice of this  
15 issue, and the evidentiary and ethical ramifications thereof, multiple times. JDC Dec. ¶13.

16 Even assuming Kantioko provides responses to the SROGs at issue prior to the hearing on  
17 this motion, Kantioko should not be permitted to avoid the consequences of her misuse of the  
18 discovery process which cost CHCDC time and expense in filing this motion. The Court may  
19 awarded sanctions “even though no opposition to the motion was filed, or opposition to the motion  
20 was withdrawn, or the requested discovery was provided to the moving party after the motion was  
21 filed.” Cal. Rules of Court 3.1348(a).

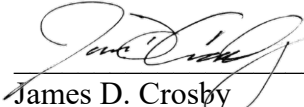
22 In meeting and conferring on this discovery and preparing this motion to compel, and for  
23 additional anticipated expenses, CHCDC has incurred or reasonably will incur fees and expenses in  
24 the amount of \$4,175. JDC Dec. 20.

#### 25 **VI. Conclusion**

26 Based on the foregoing, CHCDC respectfully requests that this Court order plaintiff Kantioko  
27 to forthwith provide full, complete and adequately verified responses to CHCDC’s Special  
28

1 Interrogatories, Set No. Two, and Kantieko and Attorney Cardiff to pay sanctions in the amount of  
2 \$4,175.

3 Date: July 18, 2025

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