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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 Plaintiffs,
13

14 v.

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

17 Defendants.
18

19 And Related Cross-Actions
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Superior Court of California,
County of San Diego

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Clerk of the Superior Court
By R. Babers ,Deputy Clerk

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 NADIA ABDULRAHMAN
TO DEFENDANT'S SPECIAL
INTERROGATORIES, SET NO. TWO, AND
REQUEST FOR SANCTIONS IN THE
AMOUNT OF \$4,175 AGAINST NADIA
ABDULRAHMAN AND ATTORNEY
CARDIFF.

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

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TABLE OF CONTENTS

I. Introduction.....4

II. Factual Background.....5

III. Legal Authority on a Motion to Compel.....6

IV. Argument.....7

 A. The Discovery at Issue is Relevant Because it Properly Explores the Evidentiary
 Foundation for Abdelrahman’s Numerous Statements Made “Under Oath”.....7

 B. The Discovery at Issue is Relevant Because it May Establish that Abdelrahman Has
 Repeatedly Lied and/or Committed Perjury In Executing Numerous Statements “Under
 Oath” In This Case.....9

 C. Plaintiffs’ “Exceeds Maximum Number of Interrogatory” Objection is Without Merit and
 Ineffective.....13

V. Sanctions Are Appropriate.....14

VI. Conclusion.....15

1
2
3
4
5
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8
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10
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12
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14
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TABLE OF AUTHORITIES

Cases:

Glenfed Dev. Corp. v. Superior Court (1997) 53 Cal.App.4th 1113.....6

Melendres v. Superior Court (2013) 215 Cal.App.4th 1343.....6-7

Williams v. Superior Court (2017) 3 Cal.5th 531.....6

Statutes:

Cal. Civ. Proc. Code §2017.010.....6

Cal. Civ. Proc. Code §2030.040(a), (b).....13

Cal. Civ. Proc. Code §2030.050.....13

Cal. Civ. Proc. Code §2030.300.....6

Cal. Civ. Proc. Code §2031.310(h).....14

Cal. Evid. Code §751(a), (c).....11

Cal. Evid. Code §1235.....8

Cal. Rule of Court 2.890(a), (c)(1), (c)(2).....11

Cal. Rules of Court 3.1348(a).....14

CACI No. 107.....12

I. Introduction

Plaintiff Nadia Abdulrahman (“Abdulrahman” or “plaintiff”) claims that she cannot read English. When deposed, she has required the presence of a certified translator to translate questions and her answers from her native dialect to English. Despite her claimed inability to read English, or read in any language for that matter, plaintiff Abdulrahman has verified, under oath, on numerous occasions, pleadings, declarations, and discovery responses, all written in English, attesting, in several different versions of verifications, that she reviewed the documents and same are true and correct. Obviously, she could not have reviewed the subject English language documents so as to allow her to verify and attest under oath that they are true and correct because she cannot read English. At times, Abdulrahman claims to have had the subject documents translated by her daughter or family members for the purposes of verification. But, defendant knows next to nothing about the translators¹, who they are, whether they are qualified to translate English documents in the required dialect, whether they have the ability to accurately translate English documents in the required dialect, the nature of their relationships with the plaintiff, whether they are biased in favor of plaintiff in this matter, whether they are otherwise witnesses to events in this case, whether the documents were actually translated in whole or in part, the method and manner of such claimed translations, whether any such claimed translations were general in nature or detailed and specific, or even the time taken to translate the documents.² These items represent the evidentiary foundation for the numerous verifications signed by plaintiff Abdulrahman under oath in the case. Defendant City Heights Community Development Corporation (“CHCDC”) is clearly entitled to investigate and undertake discovery into that evidentiary foundation. Defendant is clearly entitled to investigate and

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

² 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 undertake discovery into whether plaintiff Abdulrahman has been and is lying under oath and/or
2 committing perjury on a broad scale in this case when she repeatedly verifies as true and correct,
3 under oath, various documents she claims she cannot read.

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

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

12 **II. Factual Background**

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

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

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

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

III. Legal Authority on a Motion to Compel

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

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

- (1) An answer to a particular interrogatory is evasive or incomplete
- (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.

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

1 discovery requests are admissible evidence. *Melendres v. Superior Court* (2013) 215 Cal.App.4th
2 1343, 1349.

3 **IV. Argument**

4 A. The Discovery at Issue is Relevant Because it Properly Explores the Evidentiary 5 Foundation for Abdulrahman's Numerous Statements Made "Under Oath"

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

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

24 Q: Ms. Abdulrahman, you stated in your direct testimony that XYZ happened on January
25 21 at the farm, correct?

26 A: Yes.

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

28 A: Yes.

1 Q: I set before you your declaration dated ### and ask you to look at paragraph ## of
2 your declaration. Do you see that?
3 A: Yes.
4 Q: Please read that paragraph out loud to the jury.
5 A: “XYZ did not happen on January 21.”
6 Q: You signed that declaration under oath, correct?
7 A: Yes.
8 Q: And what you said in that under oath declaration is different to what you testified to
9 today, correct?
10 A: Uh, I don’t know.
11 Q: Well, here today in court you stated under oath that XYZ happened at the farm on
12 January 21, right?
13 A: Yes.
14 Q: But, in your prior declaration signed under oath you stated that XYZ did not happen
15 at that farm on January 21, right?
16 A: Yes, that is what it says. But it was not translated to me that way. I never would have
17 said that. It was not translated properly.

18 With this, Abdulrahman could effectively undercut the evidentiary foundation for her own
19 prior inconsistent statement and concurrently undercut defendant’s ability to challenge her
20 credibility based upon that prior inconsistent statement, by blaming the translator for a bad
21 translation. It would also undercut defendant’s ability to effectively use the statement as proof that
22 “XYZ” did not happen at the farm on January 21. Cal. Evid. Code §1235 (prior inconsistent
23 statements are an exception to the hearsay rule, admitted for the truth of the matter asserted).
24 Defendants would have no ability to challenge Abdulrahman using the claimed “translator error” to
25 undercut her own prior inconsistent statement.

26 Conversely, if defendant had the ability to identify the translators used, which the discovery
27 at issue requests, depose them, and investigate the evidentiary foundation of the translations
28 Abdulrahman relied on, defendant could counter that effort by Abdulrahman to undercut her own

1 prior inconsistent statement. Cross-examination at trial, with a certified in-court translator, could
2 hypothetically continue as follows:

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

6 A: Uh.

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

11 A: Uh.

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

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

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

Abdulrahman has utilized various *inconsistent* versions of “verifications”, or “under oath” attestations in declarations, in this case. For example, Abdulrahman’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, Nadia Abdulrahman, 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, Nadia Abdulrahman, 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.³

NOL Ex. 7, JDC Dec. ¶16. These two examples of “verifications” utilized by Abdulrahman are contradictory and cannot both be true – Abdulrahman 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 Abdulrahman 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

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

16 “I have reviewed the above responses” Verifications

17 Plaintiffs’ counsel, Attorney Cardiff, has stated, in his own declaration(s) and
18 communications, that plaintiff Abdulrahman cannot speak or read English. NOL Ex. 8; JDC Dec.
19 ¶17. In fact, Attorney Cardiff has stated that Abdulrahman cannot read in any language. NOL Ex. 9;
20 JDC Dec. ¶18. Abdulrahman has stated, in numerous “verified” pleadings and documents, that she
21 cannot read or speak English. ROA #59 CSAC ¶¶18, 125, 132, 138; NOL Ex. 7 [FROG Nos. 2.9-
22 2.10]; JDC Dec. ¶16. As such, it is unclear how Abdulrahman’s responses to CHCDC’s SROGs and
23 RFPs, written in English, could have been reviewed by Abdulrahman so as to allow her to verify and
24 attest under oath that they are true and correct. Furthermore, it is unclear how Abdulrahman’s
25 responses to CHCDC’s FROGs, written in English, could have been reviewed by, or read or
26 communicated to, Abdulrahman. The inconsistencies in Abdulrahman’s verifications highlighted
27 above raise the obvious question – if Abdulrahman needed her daughter’s assistance in translating
28 the responses to FROGs, and her counsel attests that she cannot read or speak English or read any

1 language for that matter, how can her standard verifications of her responses to the RFPs and
2 SROGs be deemed valid and truthful? They simply cannot.

3 Evidence of Perjury

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

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

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

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27 ⁴ If evidence is developed that particular pleadings, declarations, and/or discovery responses "verified" by plaintiffs, or
28 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.

1 translated documents is directly called into question.⁵ This **directly** illustrates the need for discovery
2 into the evidentiary foundations for the claimed translations of the declarations, pleadings, and
3 discovery responses plaintiff has verified, or attested to under oath, in this case.

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

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

14 Cal. Civ. Proc. §2030.040(a) states, in relevant part, "[s]ubject to the right of the responding
15 party to seek a protective order under Section 2030.090, any party who attaches a supporting
16 declaration as described in Section 2030.050 may propound a greater number of specially prepared
17 interrogatories... if this greater number is warranted" under particular circumstances. If the
18 responding party believes that the number of specially prepared interrogatories is unwarranted, the
19 responding party is to seek a protective order. *Id.*, subd. (b). "When interrogatories have been
20 propounded, the responding party... may **promptly move for a protective order.**" Cal. Civ. Proc.
21 §2030.090.

22 CHCDC's SROGs, Set No. Two, the discovery at issue in this motion was propounded on
23 June 13, 2025. JDC Dec. ¶4. CHCDC's SROG Set No. Two is supported by a declaration pursuant
24 to Cal. Civ. Proc. §2030.040(a) and §2030.050. NOL Ex. 1; JDC Dec. ¶4. The same day the
25

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

28 ⁶ If plaintiffs' counsel represents the translators in their depositions, as he has done in the past (Sahar) and as it is
suspected he will continue to do, there will be obvious conflicts of interest in such representations.

1 interrogatories were served, plaintiffs' counsel responded stating that his "clients will not be
2 responding to the discovery." NOL Ex. 2; JDC Dec. ¶5. On June 18, 2025, plaintiffs' counsel stated
3 his intention to move for a protective order. NOL Ex. 2; JDC Dec. ¶6. As of the date of this filing,
4 plaintiffs have not filed a motion for protective order. JDC Dec. ¶19. Instead, plaintiffs' counsel
5 objected to SROG, Set No. Two, with the following objection: "Exceeds maximum number of
6 interrogatories without good cause. (Code Civ. Proc. Sect. 2030.030, 2030.040(b).)" NOL Ex. 3;
7 JDC Dec. ¶7. Plaintiffs' counsel's objection is without merit and is ineffective. If plaintiff wants to
8 challenge the number of interrogatories propounded and be relieved from her obligation to respond
9 to the discovery at issue, she was required to timely file a motion for protective order. As of this
10 filing, she has not done so.

11 **V. Sanctions Are Appropriate**

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

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

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

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Date: July 18, 2025

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