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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; 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]*

SEPARATE STATEMENT OF ITEMS IN DISPUTE ISO MOTION TO COMPEL RESPONSES FROM PLAINTIFF NADIA ABDULRAHMAN TO DEFENDANT'S SPECIAL INTERROGATORIES, SET NO. TWO, 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

SEPARATE STATEMENT OF ITEMS IN DISPUTE

SPECIAL INTERROGATORY NO. 101:

Identify by name, last known address, and last known telephone number each and every individual who translated and/or assisted in translating the Declaration of Nadia Abdulrahman in Support of Ex Parte Application to Intervene, filed in San Diego Superior Court Case No. 37-2024-0009788-CU-MC-CTL, on May 24, 2024, for you for the purposes of executing the declaration under penalty of perjury therein.

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Response to Special Interrogatory No. 101:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 102:

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

Response to Special Interrogatory No. 102:

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

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Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 103:

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

Response to Special Interrogatory No. 103:

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

Reasons Why Further Response is Needed:

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

The discovery at issue is relevant because it properly explores the evidentiary foundation for Abdulrahman's numerous statements made "under oath" and because it may establish that Abdulrahman has repeatedly lied and/or committed perjury in executing numerous statements "under oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by

a declaration as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

SPECIAL INTERROGATORY NO. 104:

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

Response to Special Interrogatory No. 104:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 105:

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

Response to Special Interrogatory No. 105:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 106:

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

Response to Special Interrogatory No. 106:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 107:

Identify by name, last known address, and last known telephone number each and every individual who translated and/or assisted in translating Plaintiff Nadia Abdulrahman's Responses to Demand for Production of Documents, Set No. One, served on March 14, 2025, in San Diego Superior Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the verification of said document.

Response to Special Interrogatory No. 107:

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

Reasons Why Further Response is Needed:

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

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

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SPECIAL INTERROGATORY NO. 108:

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

Response to Special Interrogatory No. 108:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 109:

Identify by name, last known address, and last known telephone number each and every individual who translated and/or assisted in translating Plaintiff Nadia Abdulrahman's Supplemental Responses to Demand for Production of Documents, Set No. One, served on June 10, 2025, in San Diego Superior Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the verification of said document.

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Response to Special Interrogatory No. 109:

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

Reasons Why Further Response is Needed:

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

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

SPECIAL INTERROGATORY NO. 110:

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

Response to Special Interrogatory No. 110:

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

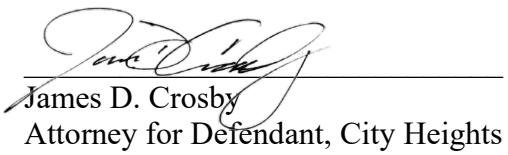
Reasons Why Further Response is Needed:

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

The discovery at issue is relevant because it properly explores the evidentiary foundation for Abdulrahman's numerous statements made "under oath" and because it may establish that

Abdulrahman has repeatedly lied and/or committed perjury in executing numerous statements "under oath" in this case. Plaintiff's "exceeds maximum number of interrogatory" objection is without merit and is ineffective. Defendant's Special Interrogatories, Set No. Two were supported by a declaration as required by Cal. Civ. Proc. §2030.040(a) and §2030.050. Plaintiff has not, as of the date of this filing, filed a motion for protective order as required by Cal. Civ. Proc. §2030.040.

Date: July 18, 2025



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