

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

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

7/18/2025 11:24:22 PM

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

Attorneys for Defendant City Heights
Community Development Corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

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

Plaintiffs,

v.

CITY HEIGHTS COMMUNITY
DEVELOPMENT CORPORATION, a
California Non-Profit Corporation; 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.

//

1 Response to Special Interrogatory No. 101:

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

15 SPECIAL INTERROGATORY NO. 102:

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 Complaint for Declaratory Relief,
18 Injunctive Relief, Recission, and Damages, filed in San Diego Superior Court Case No. 37-2024-
19 00027594-CU-OR-CTL, on June 12, 2024, for you for the purpose of your executing the verification
20 of said document.

21 Response to Special Interrogatory No. 102:

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 //

26 //

27 //

28

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

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

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

11 SPECIAL INTERROGATORY NO. 103:

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

17 Response to Special Interrogatory No. 103:

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

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

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

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

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

3 SPECIAL INTERROGATORY NO. 104:

4 Identify by name, last known address, and last known telephone number each and every
5 individual who translated and/or assisted in translating the Second Amended Complaint for
6 Declaratory Relief, Equitable Relief, and Damages, filed in San Diego Superior Court Case No. 37-
7 2024-00027594-CU-OR-CTL, on November 18, 2024, for you for the purpose of your executing the
8 verification of said document.

9 Response to Special Interrogatory No. 104:

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

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

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

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

23 SPECIAL INTERROGATORY NO. 105:

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

1 Response to Special Interrogatory No. 105:

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

15 SPECIAL INTERROGATORY NO. 106:

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

21 Response to Special Interrogatory No. 106:

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

8 SPECIAL INTERROGATORY NO. 107:

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 Nadia Abdulrahman's Responses to
11 Demand for Production of Documents, Set No. One, served on March 14, 2025, in San Diego
12 Superior Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing
13 the verification of said document.

14 Response to Special Interrogatory No. 107:

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

28 //

1 SPECIAL INTERROGATORY NO. 108:

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 Nadia Abdulrahman's Supplemental
4 Responses to Special Interrogatories, Set No. One, served on June 10, 2025, in San Diego Superior
5 Court Case No. 37-2024-00027594-CU-OR-CTL, for you for the purpose of your executing the
6 verification of said document.

7 Response to Special Interrogatory No. 108:

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

21 SPECIAL INTERROGATORY NO. 109:

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

27 //

28 //

1 Response to Special Interrogatory No. 109:

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

15 SPECIAL INTERROGATORY NO. 110:

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

20 Response to Special Interrogatory No. 110:

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

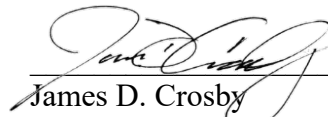
24 **Reasons Why Further Response is Needed:**

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

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

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

6
7 Date: July 18, 2025

8
9 
10 James D. Crosby
11 Attorney for Defendant, City Heights
12 Community Development Corporation
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28