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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS

Case No: 2:22-cv-01699 DJC AC

DAVID TYRONE SAMUEL,

AIMS (A MINOR),

DAYS (A MINOR)

**PLAINTIFFS' MOTION TO COMPEL  
DISCOVERY RESPONSES AND FOR  
RULE 37 SANCTIONS**

Plaintiffs,

v.

**Date: June 18, 2025**

**Time: 10:00 AM**

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY ET AL.,

**Courtroom: 26**

**Judge: Hon. Allison Claire**

Defendants

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#### **I. INTRODUCTION**

1) Plaintiffs David Samuel and Sydney Roberts respectfully move this Court to compel Defendants to produce overdue and deficient discovery responses, impose appropriate sanctions under Rule 37 and Rule 26(g), and defer consideration of

1 Defendants' pending Motion for Summary Judgment (Dkt. 83) pursuant to Rule 56(d)  
2 until discovery is complete. Plaintiffs further request an evidence preservation order,  
3 supervised discovery protocols, and adverse inferences based on Defendants' pattern  
4 of delay, obstruction, and failure to preserve responsive materials.

5  
6 2) Plaintiffs respectfully request that the Court set a hearing on this Motion to  
7 Compel Discovery Responses and for Rule 37 Sanctions on the **earliest available**  
8 **date**. Given Defendants' ongoing discovery refusals, delays, and prejudice to Plaintiffs'  
9 ability to prepare for dispositive motions and trial, expedited resolution of this dispute is  
10 critical to avoid further undue harm and preserve judicial resources. Plaintiffs will  
11 promptly meet and confer regarding scheduling and will make themselves available on  
12 any date convenient to the Court.

13  
14 3) Since the outset of this case, Defendants have consistently pursued a strategy of  
15 procedural delay rather than litigating on the merits. Defendants immediately moved to  
16 dismiss before Plaintiffs could conduct any discovery, and have subsequently  
17 obstructed Plaintiffs' efforts to obtain evidence essential to their claims. This has  
18 included withholding responsive documents and parties, failing to update the Court or  
19 Plaintiffs regarding employment or representation changes for multiple named  
20 defendants, serving evasive, boilerplate objections in response to narrowly tailored  
21 request, and making contradictory claims about when initial disclosures are due.

22  
23  
24 4) Defendants' pattern of delay is not merely negligent but demonstrates a willful  
25 disregard for their obligations under the Federal Rules of Civil Procedure, including Rule  
26 26(a)(1), Rule 26(e), Rule 33(b)(4), Rule 34(b)(2), and Rule 37(a), among others. Their  
27 position that discovery could be withheld pending summary judgment is directly contrary  
28

1 to binding Ninth Circuit precedent, including *Margolis v. Ryan*, 140 F.3d 850, 853 (9th  
2 Cir. 1998), and *Burlington N. Santa Fe R.R. Co.*, 323 F.3d 767, 773–74 (9th Cir. 2003).

3 5) Plaintiffs submit that Defendants' repeated failures in discovery and their refusal  
4 to comply with basic legal obligations are not isolated incidents, but rather reflect a  
5 systemic dysfunction at SHRA. From losing critical documents and losing track of  
6 former employees to failing to preserve electronic records, these issues are emblematic  
7 of an agency that cannot maintain even the most basic records required to comply with  
8 its legal responsibilities. This pattern of dysfunction makes future spoliation and bad  
9 faith discovery practices unavoidable, requiring the Court to intervene to restore order,  
10 enforce discovery obligations, and sanction SHRA for its failure to act in good faith.  
11

12 6) Plaintiffs have made repeated good-faith efforts to accommodate Defendants'  
13 extension requests and negotiate a rolling production schedule, but Defendants have  
14 responded with continued evasion and bad-faith denials. Defendants failed to produce  
15 any documents in response to Plaintiffs' April 3, 2025 Requests for Production and  
16 served grossly deficient interrogatory responses on May 8, 2025, followed by further  
17 improper denials and objections from individual defendants on May 12, 2025.  
18

19 7) Defendants' ongoing discovery misconduct has severely prejudiced Plaintiffs.  
20 The lack of timely production has obstructed Plaintiffs' ability to prepare depositions,  
21 oppose summary judgment, and move toward trial on an even footing. The requested  
22 relief is necessary, proportional, and supported by both the Federal Rules and  
23 controlling precedent.  
24  
25  
26  
27  
28

1 8) A detailed chronology of Plaintiffs' discovery efforts, conferral history, and the  
2 resulting prejudice is set forth in the Joint Declaration of David Samuel and Sydney  
3 Roberts ("Joint Declaration"), filed herewith.  
4

5 9) Plaintiffs seek an order compelling full and complete responses to all outstanding  
6 discovery, deeming certain requests admitted, awarding monetary and evidentiary  
7 sanctions, implementing an ongoing evidence preservation protocol, and deferring  
8 summary judgment briefing under Rule 56(d) until Defendants comply. Plaintiffs also  
9 request supervised discovery mechanisms and any other relief the Court deems just  
10 and proper. Plaintiffs certify that they have met and conferred in good faith pursuant to  
11 Local Rule 251(b)(2), as detailed in the correspondence and exhibits attached.  
12

## 13 **II. FACTUAL BACKGROUND**

### 14 **A. Early Disclosure and Initial Obstruction**

15 10) On December 4, 2023, Defendants served an answer to the complaint (Dkt. 49)  
16 containing 163 boilerplate denials and thirty-six affirmative defenses, none of which  
17 specifically addressed the core facts in Plaintiffs' complaint. This approach established  
18 a pattern of evasion that would continue throughout the litigation.  
19

20 11) On April 16, 2024, Plaintiffs proposed a discovery plan as required by the  
21 Federal Rules, but Defendants deferred any meaningful discussion, citing initial  
22 disclosures that they then failed to provide by the deadline (Ex. A at 4, 5).  
23

24 12) The Court scheduled a Status Conference for April 17, 2024 (Dkt. 50), instructing  
25 the parties to file a joint status report and informing them about participation in the  
26 VDRP program. Both sides submitted their reports on April 3, 2024 (Dkt. 52, 54).  
27  
28

1 13) On April 17, 2024, Plaintiffs served a targeted discovery request all individuals  
2 who had participated in SHRA's "Reasonable Accommodation Compliance Committee,"  
3 all hearing officers since 2000, and all personnel responsible for FHA, ADA, or  
4 Rehabilitation Act training (Ex. A at 5). Defendants failed to meaningfully respond or  
5 supplement these disclosures as required by Rule 26(e).  
6

#### 7 **B. Incomplete and Evasive Disclosures**

8 14) Defendants were ordered to provide initial disclosures by May 1, 2024, yet  
9 disclosed only five items: (a) that a video recording of the September 12, 2022 hearing  
10 existed; (b) that a "hearing brief and supporting exhibits" existed; (c) that a letter dated  
11 March 20, 2023 purportedly granted an extra-bedroom accommodation; (d) that  
12 Defendant Tanya Cruz represented SHRA at an informal hearing and could be reached  
13 via counsel; and (e) that John Lew was the hearing officer but could only be reached at  
14 a "last known" personal email address (Ex. B).  
15

16 15) None of the disclosed documents, recordings, or relevant materials were  
17 produced. Defendants also failed to update the Court or Plaintiffs that several key  
18 personnel, including multiple named defendants, were no longer employed by SHRA or  
19 otherwise available for discovery. This omission violated Rule 26(e), which requires  
20 supplementation of disclosures upon learning that prior information is incomplete or  
21 incorrect.  
22

23 16) In contrast, Plaintiffs' initial disclosures included over sixty responsive documents  
24 . Plaintiffs also voluntarily disclosed their damages computation template, consistent  
25 with Rule 26(a)(1)(A)(iii) (Ex. A at 8, Ex. E).  
26  
27  
28

1 17) On May 14, 2024, Defendants requested rescheduling of the VDRP conference,  
2 citing an inability to locate Plaintiffs' damages computation (Ex. A at 8), even though it  
3 had been clearly identified and previously disclosed (Ex. A at 8, 9). Defendants  
4 subsequently filed an ex parte motion to reschedule the VDRP conference (Dkt 61).  
5 After the rescheduling was granted, Defendants made no effort to follow up with the  
6 rescheduling (Dkt 62). Producing a claim contested by the record then using that claim  
7 as a basis for pleading has been a continued pattern throughout these proceedings.  
8

9 **C. Ongoing Pattern of Withholding and Delay**

10 18) On August 6, 2024, Defendants served Plaintiffs with a boilerplate request for  
11 production that simply duplicated Plaintiffs' prior disclosures (Ex.C, D). Plaintiffs had  
12 already produced all responsive materials in their initial packet (Ex. A at 8, Ex. E),  
13 illustrating Defendants' reluctance to move discovery forward.  
14

15 19) On November 4, 2024, Defendants submitted a duplicate request for production  
16 (Ex. E, F), appended with requests for admissions contradicted by both the record and  
17 Defendants' own conduct. Plaintiffs assumed this was a duplicate due to new Defense  
18 counsel and failure to read thoroughly due to health issues at the time.  
19

20 20) Without having produced required discovery, Defendants moved for summary  
21 judgment on March 5, 2025 (amended March 6, 2025) (Dkt. 83, 85).  
22

23 21) Plaintiffs served their own request for production on April 3, 2025, consisting of  
24 25 document requests necessary for opposing summary judgment. Defendants were  
25 obligated to respond within 30 days but failed to do so.

26 22) On April 8, 2025, Plaintiffs served a targeted interrogatory seeking identification  
27 of Doe parties central to the reasonable accommodation process (Ex. I).  
28



1 24) On April 9, 2025, Defendants' counsel sent a letter refusing to confer on  
2 outstanding discovery, explicitly stating that no discovery would proceed until the  
3 summary judgment motion was resolved (Ex. J), despite clear authority that such a  
4 position is improper under the Federal Rules and Ninth Circuit precedent.

5  
6 25) On April 10, 2025, Plaintiffs filed an amended opposition to summary judgment,  
7 including amended responses to Defendants' November 2024 requests for admission  
8 and additional evidence showing Plaintiffs' full compliance with discovery while  
9 Defendants continued to evade (Dkt 86, 88).

10  
11 26) Plaintiffs also lodged the video of the June 2, 2023 hearing, which demonstrated  
12 SHRA's abandonment of the hearing and the presence of undisclosed participants (Dkt  
13 92). This was the second instance of SHRA abandoning a hearing without explanation  
14 or documentation, and Defendants have never produced the recording for the  
15 September 12, 2022 hearing despite having acknowledged its existence.

16  
17 27) On April 11, 2025 Defendants emailed Plaintiffs claiming initial disclosures are  
18 not due until June 25, 2025 (Ex. Y). Plaintiffs responded on April 12, 2025, by serving  
19 via email Interrogatories, RFAs and RFPs on all named defendants, with a thirty-day  
20 response deadline (Ex. K-V).

21  
22 28) On April 13, 2025, Defendants' counsel Monica Castillo sent a letter  
23 acknowledging the deadlines and expressing an intent to comply, absent a need for  
24 further extension, which Plaintiffs acknowledged (Ex W, X).

25  
26 29) On April 16, 2025, Plaintiffs requested that Defendants designate Rule 30(b)(6)  
27 witnesses for each relevant topic, as required by the Federal Rules (Ex. Z).

30) On April 25, 2025, Plaintiffs served RFPs regarding the vendor employing their previous social workers of record with SHRA (Ex. AA, AB).

#### **D. Escalating Noncompliance and Prejudice**

31) On May 5, 2025, Plaintiffs reminded Defendants of the pending production deadlines and warned that a motion to compel would be filed if compliance was not forthcoming. Defendants demanded Plaintiffs produce initial discovery documents, to which Plaintiffs explained there were no further responsive materials (Ex. AC). Defendants acknowledged discovery was late and sought a one-week extension to May 12, 2025, which Plaintiffs granted conditionally on the extension of the overall discovery cut-off (Ex. AD).

32) On May 7, 2025, Defendants requested an additional extension for all discovery responses, citing difficulties contacting former SHRA employees. This was the first time Defendants disclosed that key personnel had departed. Plaintiffs agreed to extension if rolling discovery would begin by May 14, 2025, but Defendants refused. Plaintiffs then denied the extension (Ex. AE).

33) On May 8, 2025, Defendants responded to Plaintiffs' interrogatory regarding Doe parties by identifying **eleven new individuals** as members of the Reasonable Accommodation Committee, parties who should have been disclosed more than a year earlier (Ex. AG). Defendants still failed to clarify each person's role or produce a privilege log explaining any withheld information.

34) Plaintiffs immediately identified deficiencies in Defendants' responses and requested correction by May 14, 2025, followed by additional requests for a privilege log and further meet-and-confer correspondence (Ex. AG).

1 35) On May 10, 2025, Plaintiffs noticed an urgent meet and confer regarding  
2 Defendants' discovery failures (Ex. AH, AI). On May 12, 2025, Defendants again  
3 responded evasively and with incomplete responses. Plaintiffs continued to document  
4 deficiencies and pressed for compliance (Ex AJ, AK).

5  
6 36) Defendants further evaded Plaintiffs' April 16, 2025 request for Rule 30(b)(6)  
7 designations, forcing Plaintiffs to reiterate their requests and further explain the  
8 necessity of these depositions (Ex. AL - AM).

9  
10 37) Defendants email response to Plaintiffs' named-party discovery (Ex. AN) failed to  
11 mention the attached responses **revealed for the first time at least five Defendants**  
12 **were no longer employed by SHRA or considered represented parties**, and are  
13 blanket denials with no evidence that named parties had reviewed or signed the  
14 responses (Ex. AO - BL). Plaintiffs objected via letter (Ex. BN). Plaintiffs noticed a final  
15 attempt to resolve the dispute as required by Local Rule 251 (Ex. BO, BP).

16  
17 38) On May 14, 2025, Defendants again refused to comply and asserted that  
18 discovery would be delayed until May 30, 2025, further compounding prejudice and  
19 violating multiple discovery obligations (Ex. BO).

### 20 III. LEGAL STANDARDS

21 39) The scope of discovery in federal court is governed by Federal Rule of Civil  
22 Procedure 26(b)(1), which permits parties to obtain discovery regarding any  
23 nonprivileged matter that is relevant to any party's claim or defense and proportional to  
24 the needs of the case. The Ninth Circuit has emphasized that this standard must be  
25 construed liberally, particularly in civil rights actions. See *Survivor Media, Inc. v.*  
26  
27

Survivor Prods., 406 F.3d 625, 635 (9th Cir. 2005); United States v. Cal. Dep't of Corr., 201 F.R.D. 153, 155 (N.D. Cal. 2001).

40) Under Federal Rules of Civil Procedure 33(b)(4) and 34(b)(2)(B), parties are required to state objections to discovery requests with specificity. The Ninth Circuit has held that generalized or boilerplate objections are improper and may result in waiver of the objection. See Burlington N. & Santa Fe Ry. v. U.S. Dist. Ct., 408 F.3d 1142, 1149 (9th Cir. 2005). District courts have further explained that boilerplate, generalized objections are “tantamount to not making any objection at all.” A. Farber & Partners, Inc. v. Garber, 234 F.R.D. 186, 188 (C.D. Cal. 2006). Evasive or incomplete answers must be treated as a failure to answer, and the Court may order sanctions under Rule 37(a) (4).

41) Every discovery response must be signed by counsel or a party under Federal Rule of Civil Procedure 26(g), certifying that the response is complete and correct after a reasonable inquiry. Certifications made without proper investigation, or for the improper purpose of causing delay, require the Court to impose an appropriate sanction. See G.C. & K.B. Investments, Inc. v. Wilson, 326 F.3d 1096, 1111 (9th Cir. 2003); Fed. R. Civ. P. 26(g)(3).

42) When an opposing party fails to answer or provides evasive responses, Federal Rule of Civil Procedure 37(a) authorizes the filing of a motion to compel. The Court must require payment of reasonable expenses unless the failure was substantially justified or other circumstances make an award unjust. See Hyde & Drath v. Baker, 24 F.3d 1162, 1171 (9th Cir. 1994).

1 43) Rule 37(b), (d), and (e) grant courts wide discretion to impose sanctions for  
2 discovery misconduct, including evidentiary preclusion, issue preclusion, adverse  
3 inferences, monetary penalties, and even default or dismissal. See *Valley Engineers*  
4 *Inc. v. Elec. Eng'g Co.*, 158 F.3d 1051, 1056–58 (9th Cir. 1998); *Leon v. IDX Sys. Corp.*,  
5 464 F.3d 951, 958–60 (9th Cir. 2006); *Conn. Gen. Life Ins. Co. v. New Images of*  
6 *Beverly Hills*, 482 F.3d 1091, 1096–97 (9th Cir. 2007).

8 44) Federal Rule of Civil Procedure 37(e) specifically addresses the preservation of  
9 electronically stored information (ESI) and program records. The Ninth Circuit and  
10 district courts hold that parties must preserve evidence when they know or should know  
11 that it is relevant to anticipated or pending litigation. See *Micron Tech., Inc. v. Rambus*  
12 *Inc.*, 645 F.3d 1311, 1320 (Fed. Cir. 2011); *Apple Inc. v. Samsung Elecs. Co.*, 888 F.  
13 *Supp. 2d* 976, 989–91 (N.D. Cal. 2012). Where ESI is lost and prejudice results, the  
14 Court may order measures no greater than necessary to cure the prejudice; if there is  
15 intent to deprive, the Court may presume that the lost information was unfavorable,  
16 instruct the jury, or impose case-dispositive sanctions. Fed. R. Civ. P. 37(e)(2); *Leon*,  
17 464 F.3d at 959; *Silvestri v. Gen. Motors Corp.*, 271 F.3d 583, 590 (4th Cir. 2001).

20 45) Federal courts have the authority to appoint a special master or monitor to  
21 oversee discovery where there is a history of obstruction, delay, or repeated violation of  
22 court orders. See *In re Hanford Nuclear Reservation Litig.*, 521 F.3d 1028, 1050 (9th  
23 Cir. 2008); Fed. R. Civ. P. 53(a)(1)(C); *Goodyear Tire & Rubber Co. v. Haeger*, 581  
24 U.S. 101, 108 (2017).

26 46) Rule 56(d) of the Federal Rules of Civil Procedure protects parties who cannot  
27 present facts essential to justify their opposition to summary judgment due to opposing  
28

1 party's obstruction. The Ninth Circuit disfavors summary judgment where relevant  
2 evidence remains to be discovered as a result of discovery misconduct. See Burlington  
3 N. Santa Fe R.R. Co., 323 F.3d 767, 773–74 (9th Cir. 2003); Tatum v. City and County  
4 of San Francisco, 441 F.3d 1090, 1100 (9th Cir. 2006).

5  
6 47) Defendants, as a HUD grantee and public agency, are subject to additional  
7 recordkeeping and disclosure duties under the California Public Records Act (CPRA),  
8 HUD regulations, and SHRA's own Administrative Plan. California Government Code §  
9 6253(c) requires prompt responses to public records requests. HUD regulations  
10 mandate the tracking and retention of reasonable accommodation requests, rent  
11 reasonableness data, and hearing records. SHRA's 2022 Administrative Plan, including  
12 Chapters 11, 18, and 24, creates mandatory obligations to maintain and produce such  
13 records when requested.  
14

15 48) Under Local Rule 251(b) of the Eastern District of California, a motion to compel  
16 must demonstrate that the moving party made good-faith efforts to resolve disputes  
17 without court intervention. See, e.g., Shuffle Master, Inc. v. Progressive Games, Inc.,  
18 170 F.R.D. 166, 171 (D. Nev. 1996).  
19

#### 20 **IV. ARGUMENT**

21 49) Defendants have failed to meet their discovery obligations at every stage of this  
22 litigation. Their failure is not limited to initial disclosures, but extends to a pattern of  
23 evasive responses, improper objections, and willful withholding of critical evidence. The  
24 conduct described below demonstrates a deliberate and continuing course of  
25 obstruction that has prejudiced Plaintiffs and undermined the integrity of the judicial  
26 process.  
27  
28

50) From the outset, Defendants failed to provide meaningful initial disclosures as required by Rule 26(a)(1)(Ex. B). Instead of disclosing known responsive parties (Ex. AG) and available evidence, Defendants served placeholder disclosures that failed to identify actual individuals or produce basic documentation. Notably, Defendants omitted contact information and employment status for multiple key witnesses, and **did not update these disclosures even after learning that several named defendants were no longer employed by SHRA** (Ex. AX-BJ). This omission violates the duty to supplement under Rule 26(e) and directly impaired Plaintiffs' ability to identify, locate, and depose essential witnesses.

51) The concealment of key personnel and other responsive parties misled both Plaintiffs and the Court, preventing Plaintiffs from preserving testimony and issuing timely subpoenas. Even more egregious, Defendants **disclosed nearly a dozen new relevant parties only after more than two years of litigation had passed**(Ex. AG), failing to clarify the specific roles or responsibilities of these individuals with respect to the claims and defenses in this case.

52) Beyond initial disclosures, Defendants have repeatedly refused to comply with their obligations under Rules 33 and 34. Plaintiffs' April 3, 2025 Requests for Production were met with no documents (Ex. H). Interrogatory responses provided by Defendants on May 8, 2025 were non-responsive and evasive, and individual defendants' responses served on May 12, 2025 were composed almost entirely of improper denials and blanket objections (Ex. AF-BL). The cumulative effect of these failures has been to obstruct Plaintiffs' ability to gather evidence and to prepare their case.

53) **Defendants' discovery responses have been signed by counsel Monica Castillo, certifying compliance on behalf of multiple Defendants who are no longer employed by SHRA and whose current contact information is unknown** (AO-BL). This lack of client control or communication demonstrates a failure to make a reasonable inquiry under Rule 26(g)(1) and constitutes false certification under Rule 26(g)(3). See *G.C. & K.B. Investments, Inc. v. Wilson*, 326 F.3d 1096, 1111 (9th Cir. 2003); Fed. R. Civ. P. 26(g)(3).

54) The use of boilerplate objections and evasive responses (Ex. AF-BL) is expressly prohibited by Rule 33(b)(4) and Rule 34(b)(2), as well as controlling authority in the Ninth Circuit. See *Burlington N. & Santa Fe Ry. v. U.S. Dist. Ct.*, 408 F.3d 1142, 1149 (9th Cir. 2005); *A. Farber & Partners, Inc. v. Garber*, 234 F.R.D. 186, 188 (C.D. Cal. 2006). The Court should treat Defendants' conduct as a failure to answer, and impose appropriate sanctions as provided in Rule 37(a)(4).

55) SHRA's refusal to identify relevant personnel, produce reasonable accommodation tracking logs, or provide internal documentation (Ex. BD) further violates not only the Federal Rules, but also SHRA's own Administrative Plan and HUD recordkeeping requirements. The inability or unwillingness to comply with these mandates has materially obstructed discovery and deprived Plaintiffs of essential evidence needed to support their claims (Ex. I).

56) Defendants' conduct is not the result of isolated oversight, but rather a coordinated strategy of obstruction and delay. Throughout the litigation, Defendants have shifted positions regarding whether discovery was open, refused to identify Rule 30(b)(6) witnesses as required by the Federal Rules, claiming disclosures were not



1 necessary until close of discovery, and failed to supplement disclosures despite being  
2 aware that their information was incomplete or inaccurate (Ex J, AL-AM). Their  
3 consistent refusal to confer in good faith further demonstrates a tactical decision to gain  
4 an unfair advantage by denying Plaintiffs a reasonable opportunity to prepare for  
5 depositions or to oppose summary judgment.  
6

7 57) The Federal Rules require that objections to discovery be stated with specificity  
8 and good faith. Vague or generalized objections are insufficient and must be  
9 disregarded. See A. Farber & Partners, Inc., 234 F.R.D. at 188. Evasive or incomplete  
10 responses must be treated as a failure to answer. See Fed. R. Civ. P. 37(a)(4). Given  
11 the pattern of repeated noncompliance, the Court should impose monetary sanctions,  
12 evidentiary sanctions, and, if necessary, issue preclusion or default as permitted under  
13 Rule 37(b).  
14

15 58) In addition to these procedural failures, **Defendants have failed to preserve or**  
16 **produce core program records and electronically stored information** as required  
17 by Rule 37(e) and applicable federal and state law (Ex. E, AI-AK). Examples of missing  
18 evidence include reasonable accommodation tracking logs, rent reasonableness  
19 determinations, and hearing outcome documentation. These records qualify as ESI and  
20 are subject to strict preservation and production requirements under the Federal Rules,  
21 HUD guidance, and SHRA's own policies.  
22

23 59) Defendants' refusal to produce or account for these records, despite ongoing  
24 litigation, justifies the imposition of adverse inferences under Rule 37(e) and *Silvestri v.*  
25 *Gen. Motors Corp.*, 271 F.3d 583, 590 (4th Cir. 2001). The absence of a litigation hold  
26 notice, a privilege log, or sworn statements regarding document retention and search  
27  
28

1 efforts constitutes at least gross negligence, if not intentional spoliation or bad faith  
2 under Rule 37(e)(2) (Ex. AI-AK, AN).

3 60) Plaintiffs request that the Court require Defendants to submit sworn declarations  
4 detailing their ESI search protocols, document retention practices, and any litigation  
5 hold efforts since the filing of this lawsuit. Defendants' failure to provide such  
6 certification, despite repeated requests, is sanctionable and further supports the need  
7 for judicial intervention.  
8

9 61) Plaintiffs have satisfied all meet-and-confer obligations required by Local Rule  
10 251(b) (Ex. AN). Plaintiffs have made multiple good-faith efforts to resolve these issues  
11 without court intervention, including formal correspondence, proposed conferences, and  
12 detailed documentation of deficiencies. Defendants have repeatedly refused to  
13 participate in a Rule 26(f) conference and have delayed conferral for strategic reasons,  
14 compounding the prejudice to Plaintiffs and further evidencing a lack of good faith.  
15

16 62) Defendants' ongoing discovery failures have deprived Plaintiffs of the ability to  
17 present essential facts in opposition to summary judgment. Rule 56(d) provides that  
18 summary judgment should be deferred or denied where a party cannot present facts  
19 essential to justify its opposition due to the opposing party's failure to produce evidence.  
20 The Ninth Circuit has held that summary judgment is reversible error when relevant  
21 discovery is outstanding as a result of obstruction. See *Tatum v. City and County of San*  
22 *Francisco*, 441 F.3d 1090, 1100 (9th Cir. 2006).  
23

24 63) The withheld documents and information in this case including reasonable  
25 accommodation logs, hearing recordings, internal correspondence, rent reasonableness  
26 records, and identification of all personnel responsible for the decisions at issue are  
27

1 directly relevant to Plaintiffs' ability to rebut Defendants' summary judgment arguments.  
2 Plaintiffs have satisfied their burden under Rule 56(d) by demonstrating that further  
3 discovery is essential and that Defendants' conduct has deprived them of the evidence  
4 necessary to fully respond to dispositive motions.  
5

6 64) Given the persistent and egregious nature of Defendants' misconduct, and the  
7 resulting prejudice to Plaintiffs' ability to prosecute their claims, substantial sanctions  
8 are warranted under Rule 37 and Rule 26(g). The Court should grant the full range of  
9 relief requested herein to ensure that Defendants are not rewarded for their bad faith  
10 and that Plaintiffs are provided a fair opportunity to litigate their claims on the merits.  
11

## 12 **V. PREJUDICE AND NEED FOR SANCTIONS**

13 65) Defendants' pattern of discovery violations has inflicted substantial and  
14 compounding prejudice on Plaintiffs in several interrelated and independently sufficient  
15 ways. The harm is not limited to lost evidence but has deeply impaired Plaintiffs' ability  
16 to litigate this matter, respond to dispositive motions, and secure just outcomes at every  
17 stage of the proceedings.  
18

19 66) The most acute prejudice stems from lost access to key witnesses. **Defendants'**  
20 **failure to timely disclose the departures and lost contact information of multiple**  
21 **individuals such as Tanya Cruz, Ibra Henley, Tiffany Brown, Lisa Macias, and**  
22 **Tameka Jackson deprived Plaintiffs of a meaningful opportunity to depose these**  
23 **witnesses, obtain sworn statements, or preserve essential testimony while they**  
24 **were still accessible** (Ex. AG, AO-BL). This omission violated the duty to supplement  
25 under Rule 26(e) and has permanently foreclosed discovery from central actors  
26 involved in the events underlying Plaintiffs' claims.  
27  
28

1 67) Plaintiffs have also suffered grave documentary prejudice. Defendants' refusal to  
2 provide reasonable accommodation tracking logs, rent reasonableness data, hearing  
3 outcome records, internal correspondence, and ESI related to departed employees has  
4 made it impossible for Plaintiffs to test Defendants' factual claims, evaluate the  
5 decisionmaking process, or fully develop their own evidence (Ex. I, BD). Many of these  
6 materials are mandated by HUD regulation, SHRA's Administrative Plan, and the  
7 Federal Rules, and their absence not only undermines the record but supports a finding  
8 of spoliation under Rule 37(e).  
9

10 68) **Counsel's certification of discovery responses on behalf of clients that**  
11 **cannot be reached or controlled by defense counsel impairs Plaintiffs' ability to**  
12 **obtain truthful and complete discovery** (Ex. AN, AO-BL). This practice prejudices  
13 Plaintiffs by preventing effective follow-up, conferral, or deposition preparation and  
14 undermines the integrity of the discovery process.  
15

16 69) Defendants' procedural tactics have compounded the prejudice to Plaintiffs. By  
17 simultaneously pursuing summary judgment and withholding basic discovery,  
18 Defendants forced Plaintiffs to respond to dispositive motions without the evidence  
19 necessary to contest Defendants' asserted facts (Ex. J, AD-AE). This approach is  
20 fundamentally unfair and is condemned by binding authority, including *Tatum v. City*  
21 *and County of San Francisco*, 441 F.3d 1090, 1100 (9th Cir. 2006), which holds that  
22 summary judgment is improper where relevant evidence has been withheld due to  
23 discovery obstruction.  
24

25 70) Further prejudice to the integrity of these proceedings arises from Defendants'  
26 certification of discovery responses under Rule 26(g) that were knowingly incomplete or  
27

1 false. For example, defense counsel certified responses on behalf of parties whose  
2 employment status was undisclosed and who had not participated in the review or  
3 signing of those responses. These improper certifications undermine both the truth-  
4 seeking function of discovery and the integrity of the litigation process, and  
5 independently warrant sanctions as required by Rule 26(g)(3).  
6

7 71) Defendants' refusal to produce a privilege log, as required by Rule 26(b)(5)(A)  
8 and Local Rule 250.4, and their pattern of offering inconsistent explanations for  
9 noncompliance, have forced Plaintiffs to repeatedly expend time and resources  
10 documenting deficiencies, seeking clarification, and preparing motions that would have  
11 been unnecessary but for Defendants' bad faith (Ex. AI-AK, BO-BP).  
12

13 72) The cumulative effect of Defendants' conduct has been to shift the entire burden  
14 of discovery onto Plaintiffs, while obscuring the parties and records necessary to  
15 prosecute their case. Defendants' failure to disclose changes in status or contact  
16 information has left Plaintiffs unable to plan depositions, pursue alternate sources of  
17 evidence, or prepare their opposition to summary judgment on an even footing. The  
18 resulting disadvantage is not merely procedural but rises to the level of structural  
19 prejudice, requiring substantial judicial intervention.  
20

21 73) Defendants' conduct has also caused substantial personal and financial harm to  
22 Plaintiffs. The increased and unnecessary time spent pursuing missing or incomplete  
23 discovery has diverted attention from Plaintiffs' family and minor children, required  
24 extensions of legal research database subscriptions, resulted in additional trips to the  
25 courthouse, and created direct out-of-pocket expenses for childcare and lost work  
26  
27  
28

opportunities. Such harms are directly compensable through fee-shifting under Rule 37(a)(5) and *Hyde & Drath v. Baker*, 24 F.3d 1162, 1171 (9th Cir. 1994).

74) Specific instances of prejudice are further illustrated by Defendants' failure to provide the September 12, 2022 hearing video (Ex. B), which would have allowed Plaintiffs to rebut Defendants' claim that hearings were conducted according to law. Plaintiffs have also not received any information regarding the new individuals identified belatedly as Reasonable Accommodation Committee members, nor any discovery regarding hearing officers or consultants who played a role in the decisions at issue.

75) Defendants' failure to properly update disclosures regarding former employees and the assertion that all related ESI is now spoliated further demonstrates deliberate obstruction (Ex. AI, AN, AO-BL). Plaintiffs are left with no viable means to compel production of these records or to reconstruct the underlying facts, and must ask the Court to impose adverse inferences as authorized by Rule 37(e)(2) and supported by *Silvestri v. Gen. Motors Corp.*, 271 F.3d 583, 590 (4th Cir. 2001).

76) Plaintiffs have also been prejudiced in their ability to demonstrate that Defendants' post-hoc modifications or offers to "cure" discrimination after-the-fact did not eliminate the original harm (Ex. F, AG). Withheld discovery would have supported Plaintiffs' position that Defendants' asserted "grant" of accommodation in March 2023 was pretextual and did not address the denial of rights or due process that had already occurred (Ex. Q). This directly rebuts Defendants' primary defenses in their summary judgment filings.

77) As of this filing, Defendants have still not disclosed which of the newly identified Reasonable Accommodation Committee members or former employees remain within

1 their control or have current contact information. This ongoing failure frustrates Plaintiffs'  
2 ability to plan remaining discovery and further supports a finding that additional  
3 sanctions and relief are required (Ex. AO-BL).

4  
5 78) In light of these ongoing and compounding harms, Plaintiffs respectfully submit  
6 that the record supports not only compelled production and fee-shifting, but also the  
7 imposition of adverse inferences, preclusion of undisclosed evidence, and such other  
8 sanctions as are necessary to restore the fairness and integrity of these proceedings.

9  
10 **VI. REQUEST FOR RELIEF**

11 79) Plaintiffs respectfully request that the Court order Defendants to provide full and  
12 complete responses to all outstanding discovery, including Plaintiffs' April 3, 2025  
13 Requests for Production, April 8, 2025 Interrogatories, and April 12, 2025 Requests for  
14 Admission, Interrogatories, and Requests for Production to Individual Defendants, within  
15 ten days of the Court's order, with certification of compliance under Rule 26(g).

16  
17 80) Plaintiffs ask that the Court deem as admitted any Request for Admission for  
18 which Defendants' denial is contradicted by the record, documentary evidence, or  
19 judicial admissions, or otherwise entered in bad faith.

20 81) Plaintiffs request that the Court compel Defendants to serve a privilege log that  
21 fully complies with Rule 26(b)(5)(A) and Local Rule 250.4 for all documents withheld  
22 under a claim of privilege, to be produced within seven days.

23  
24 82) Plaintiffs further request that Defendants be required to submit sworn  
25 declarations, under penalty of perjury, detailing all document retention and destruction  
26 policies, all efforts and methods used to search for responsive records and ESI, the  
27

1 identities of all custodians and locations searched, and all discovery certifications made  
2 pursuant to Rule 26(g).

3 83) Plaintiffs ask the Court to impose monetary sanctions against Defendants and  
4 their counsel under Rule 37(a)(5) and Rule 26(g)(3) for all costs and fees incurred in  
5 connection with this motion and any future discovery violations, with the amount of such  
6 sanctions to be determined upon submission of Plaintiffs' fee and cost statement. These  
7 sanctions should include compensation for legal database subscriptions, additional  
8 travel to court, child care costs, and other direct consequences of Defendants' discovery  
9 misconduct, as justified by *Hyde & Drath v. Baker*, 24 F.3d 1162, 1171 (9th Cir. 1994).  
10

11 84) Plaintiffs request that the Court impose evidentiary sanctions and specific  
12 adverse inferences as authorized by Rule 37(e) and the Court's inherent authority.  
13 Plaintiffs seek findings that the testimony of unavailable SHRA employees would have  
14 been unfavorable to Defendants and would have corroborated Plaintiffs' claims; that  
15 missing or destroyed video, audio, or documentation from the relevant hearings would  
16 have shown a denial of fair process; that missing rent reasonableness records would  
17 have undermined Defendants' stated rationale for their denials; that the absence of  
18 internal call logs or configuration data for the Reasonable Accommodation line supports  
19 a finding of denial of access to services; and that any emails or ESI not preserved or  
20 searched, including those of departed employees, would have shown knowledge of  
21 discrimination or intent to deny accommodations.  
22

23 85) Plaintiffs further request that the Court defer or deny Defendants' pending Motion  
24 for Summary Judgment (Dkt. 83) pursuant to Rule 56(d), and enter a revised schedule  
25 for opposition briefing and evidentiary hearings following full compliance with this Order.  
26  
27  
28



1 Plaintiffs seek an order precluding Defendants from relying on any documents or  
2 witnesses not disclosed or produced prior to compliance with the Court's order.

3 86) Plaintiffs ask the Court to order Defendants to meet and confer in good faith and  
4 promptly identify, by name and role, the designated witnesses for each Rule 30(b)(6)  
5 topic noticed by Plaintiffs, to provide availability for depositions, and to certify that such  
6 designations are complete and accurate.

7  
8 87) Plaintiffs request that the Court order the implementation of an evidence  
9 preservation protocol, including immediate suspension of all data or record purge  
10 policies and ongoing retention of all program data, staff communications, and internal  
11 tracking logs relevant to Plaintiffs' claims, with written certification of compliance by  
12 SHRA's records officer or general counsel.

13  
14 88) Plaintiffs respectfully ask the Court to expressly reserve its authority to impose  
15 further sanctions under Rule 37(b) and the Court's inherent powers, including issue  
16 sanctions, evidence preclusion, default judgment, or monetary contempt sanctions, in  
17 the event of continued noncompliance or violation of any discovery order.

18  
19 89) Plaintiffs seek an order establishing as facts for purposes of this case that  
20 Defendants did not provide Plaintiffs with a meaningful reasonable accommodation  
21 process; that Defendants followed a blanket policy of denial with no individualized  
22 assessment; and that Defendants' stated reasons for denial were pretextual or  
23 unsupported by contemporaneous records.

24  
25 90) Plaintiffs ask that Defendants be precluded from offering any evidence,  
26 argument, or testimony at trial or in dispositive motion practice regarding the reasons for  
27 denying Plaintiffs' accommodation requests or the sufficiency of their reasonable  
28

1 accommodation policies, except as contained in documents actually produced to  
2 Plaintiffs in discovery.

3 91) In the event of continued noncompliance, Plaintiffs request that Defendants and  
4 their counsel be ordered to pay a coercive daily fine for each day of noncompliance and  
5 to show cause why default judgment should not be entered against them under Rule  
6 37(b) and the Court's inherent authority.

7 92) Plaintiffs further request that the Court require individual sworn declarations  
8 under penalty of perjury from each named Defendant and from defense counsel  
9 attesting to their full search efforts, knowledge of document retention, and compliance  
10 with all discovery obligations in this matter.

11 93) Plaintiffs seek the appointment of a neutral discovery monitor or special master  
12 at Defendants' expense to oversee and report on ongoing discovery compliance, given  
13 the demonstrated pattern of delay, obstruction, and noncompliance.

14 94) Plaintiffs request that the Court order a forensic audit or third-party review of  
15 SHRA's document retention, ESI management, and reasonable accommodation  
16 policies and practices, to ensure no further spoliation, concealment, or violation of  
17 Plaintiffs' rights or the rights of other program participants.

18 95) Plaintiffs ask that the Clerk or appropriate party be directed to transmit a copy of  
19 the Court's findings and any sanction order to the U.S. Department of Housing and  
20 Urban Development (HUD) for review and investigation of systemic recordkeeping, due  
21 process, and reasonable accommodation deficiencies affecting federally funded  
22 programs.

1 97) Plaintiffs request such other and further relief as the Court deems just and  
2 proper, including the timely determination and award of all monetary penalties or  
3 sanctions to which Plaintiffs are entitled under the Federal Rules or the Court's inherent  
4 authority.  
5

## 6 **VII. REQUEST FOR EXPEDITED RELIEF**

7 98) Because this discovery dispute directly impacts Plaintiffs' ability to litigate their  
8 claims and respond to Defendants' Motion for Summary Judgment, Plaintiffs request  
9 that the Court set the hearing on this Motion at the earliest possible date permitted  
10 under the Court's calendar and local rules. Plaintiffs submit that an expedited ruling is  
11 necessary to avoid further prejudice, unnecessary expense, and delay of the  
12 proceedings. Plaintiffs stand ready to meet and confer with Defendants and the Court  
13 regarding scheduling.  
14

## 15 **VIII. CONCLUSION**

16 100) The record demonstrates a pattern of bad faith by Defendants, including false or  
17 incomplete certifications under Rule 26(g), improper reliance on boilerplate and evasive  
18 objections, refusal to confer or participate in good-faith discovery, failure to preserve  
19 and produce essential program records and electronically stored information, and  
20 concealment of witness unavailability and relevant parties. The resulting prejudice has  
21 affected every phase of this litigation, from the identification and preservation of key  
22 witnesses and documents to the ability to oppose summary judgment on a level playing  
23 field.  
24

25 101) Defendants' conduct is precisely the type that Rule 37, Rule 26(g), and binding  
26 Ninth Circuit precedent condemn. Judicial intervention is not only warranted, but  
27

1 essential to restore the integrity of these proceedings and ensure that Defendants do  
2 not benefit from their obstruction. The relief sought herein is narrowly tailored to the  
3 scope of Defendants' violations and is both necessary and proportional to the  
4 cumulative harm inflicted upon Plaintiffs.

5  
6 102) Plaintiffs therefore respectfully request that the Court grant all relief set forth  
7 above, including compelling immediate and complete production of all outstanding  
8 discovery, awarding monetary and evidentiary sanctions, imposing adverse inferences  
9 and other necessary preclusion orders, requiring sworn certifications and supervised  
10 discovery protocols, and deferring or denying Defendants' Motion for Summary  
11 Judgment until compliance is achieved. Plaintiffs further request that the Court  
12 expressly reserve the right to impose additional sanctions in the event of continued  
13 noncompliance, and to transmit its findings to the U.S. Department of Housing and  
14 Urban Development for investigation of systemic deficiencies.

15  
16 103) Plaintiffs request such other and further relief as the Court deems just and proper  
17 in the interests of justice and to vindicate the rights of parties aggrieved by deliberate  
18 discovery abuse.

19  
20 Respectfully Submitted,  
21

22  
23 *David Samuel*

24 

---

David Samuel  
May 16, 2025

25  
26 *Sydney Roberts*

27 

---

Sydney Roberts  
May 16, 2025  
28

## EXHIBITS

The following exhibits are attached in support of Plaintiffs' Motion to Compel Discovery Responses and for Rule 37 Sanctions. Plaintiffs reserve the right to update, supplement, or renumber these exhibits upon receipt of additional evidence or upon the Court's direction.

Exhibit A: Email March – May 2024 email chain regarding initial disclosures.

Exhibit B: Defendants' initial disclosure.

Exhibit C: Defendants August 6, 2024 RFP Samuel

Exhibit D: Defendants August 6, 2024 RFP Roberts

Exhibit E: Plaintiffs Disclosed Evidence List May 06, 2024

Exhibit F: Defendants November 4, 2024 RFP + RFA Samuel

Exhibit G: Defendants November 4, 2024 RFP + RFA Roberts

Exhibit H: April 3, 2025 Request For Production General 1 (SHRA-only)

Exhibit I: April 8, 2025 Reveal Does Request

Exhibit J: Defendants April 9, 2025 Letter of Intent to Avoid Discovery

Exhibit K: DOZIER April 12, 2025 Interrogatories and RFAs

Exhibit L: DOZIER April 12, 2025 Interrogatories and RFAs, second set

Exhibit M: PAULSON April 12, 2025 Interrogatories and RFAs

Exhibit N: PAULSON April 12, 2025 Interrogatories and RFAs, second set

Exhibit O: HENLEY April 12, 2025 Interrogatories and RFAs

Exhibit P: HENLEY April 12, 2025 Interrogatories and RFAs, second set

Exhibit Q: LYNCH April 12, 2025 Interrogatories and RFAs

Exhibit R: CRUZ April 12, 2025 Interrogatories and RFAs

1 Exhibit S: MACIAS April 12, 2025 Interrogatories and RFAs  
2 Exhibit T: BROWN April 12, 2025 Interrogatories and RFAs  
3 Exhibit U: JACKSON April 12, 2025 Interrogatories and RFAs  
4 Exhibit V: SHRA April 12, 2025 Request for Production Re: Leah SHAW  
5 Exhibit W: Defendants Clarification and Intent to Comply 04-13-2025  
6 Exhibit X: Email Correspondence Acknowledging Rule 26 Compliance 04-13-2025  
7 Exhibit Y: Defendants Intent to Avoid Discovery Until Close 04-11-2025  
8 Exhibit Z: RFPs for 30(b)(6) Designees 04-16-2025  
9 Exhibit AA: RFPs for Consumer Self Help Housing Interactions 04-25-2025  
10 Exhibit AB: RFPs for Sacramento Self Help Housing, PRTS, etc 04-25-2025  
11 Exhibit AC: Plaintiffs Reminder of Deadlines and Initial Discovery 05-05-2025  
12 Exhibit AD: Emails Acknowledging Late Discovery, Extension Request 05-05-2025  
13 Exhibit AE: Emails First 30 Day Extension, Conditional Grant, Declined 05-07-2025  
14 Exhibit AF: Evasive DOES responses, Clarifications 05-08-2025  
15 Exhibit AG: Defendants Reveal DOES Response 05-08-2025  
16 Exhibit AH: Meet and Confer Re No April 3 and DOES Response 05-10-2025  
17 Exhibit AI: Email Overdue & Deficient Discovery Responses 05-10-2025  
18 Exhibit AJ: Plaintiffs Email with Letter Avoiding April 8 Disc 05-12-2025  
19 Exhibit AK: Plaintiffs Letter Avoiding April 08, 2025 Discovery 05-12-2025  
20 Exhibit AL: 30(b)(6) Avoidance and Response Email 05-12-2025  
21 Exhibit AM: Defendants 30(b)(6) Avoidance Letter 05-12-2025  
22 Exhibit AN: Plaintiffs 30(b)(6) Avoidance Response 05-13-2025  
23 Exhibit AO: DOZIER RFA Avoidance 05-12-2025  
24  
25  
26  
27  
28 PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES AND FOR RULE 37 SANCTIONS - 30

1 Exhibit AP: DOZIER RFA Set Two Avoidance 05-12-2025  
2 Exhibit AQ: DOZIER Interrogatory Avoidance 05-12-2025  
3 Exhibit AR: DOZIER Interrogatory Avoidance Set Two 05-12-2025  
4 Exhibit AS: PAULSON RFA Avoidance 05-12-2025  
5 Exhibit AT: PAULSON RFA Avoidance Set 2 05-12-2025  
6 Exhibit AU: PAULSON Interrogatory Avoidance 05-12-2025  
7 Exhibit AV: PAULSON Interrogatory Avoidance Set Two 05-12-2025  
8 Exhibit AW: PAULSON RFP Avoidance 05-12-2025  
9 Exhibit AX: HENLEY RFA Avoidance 05-12-2025  
10 Exhibit AY: HENLEY RFA Avoidance Set Two 05-12-2025  
11 Exhibit AZ: HENLEY Interrogatory Avoidance 05-12-2025  
12 Exhibit BA: HENLEY Interrogatory Avoidance Set Two 05-12-2025  
13 Exhibit BB: MACIAS RFA Avoidance 05-12-2025  
14 Exhibit BC: MACIAS Interrogatory Avoidance 05-12-2025  
15 Exhibit BD: SHRA RFP Avoidance 05-12-2025  
16 Exhibit BE: JACKSON RFP Avoidance 05-12-2025  
17 Exhibit BF: JACKSON RFP Avoidance 05-12-2025  
18 Exhibit BG: CRUZ RFA Avoidance 05-12-2025  
19 Exhibit BH: CRUZ Interrogatory Avoidance 05-12-2025  
20 Exhibit BI: BROWN RFA Avoidance 05-12-2025  
21 Exhibit BJ: BROWN Interrogatory Avoidance 05-12-2025  
22 Exhibit BK: LYNCH RFA Avoidance 05-12-2025  
23 Exhibit BL: LYNCH Interrogatory Avoidance 05-12-2025  
24  
25  
26  
27  
28

1 Exhibit BN: Plaintiffs Response to Defendants 30(b)(6) and Disc Avoidance 05-13-2025

2 Exhibit BO: LR 251 Dispute Resolution Attempt Email 5-12-2025

3 Exhibit BP: Plaintiffs LR251 Resolution Attempt Letter 05-12-2025

4  
5  
6  
7 Additional exhibits to be labeled and described as necessary upon further  
8 supplementation.





David Samuel &lt;davidsa@possiblymaybe.com&gt;

---

**RE: Roberts v. SHRA; 21727.00057**

18 messages

---

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>

Fri, Mar 22, 2024 at 1:59 PM

To: David Samuel &lt;davidsa@possiblymaybe.com&gt;, "Garson, Edward" &lt;Edward.Garson@wilsonelser.com&gt;

Cc: "Ferreira, Vieana" &lt;Vieana.Ferreira@wilsonelser.com&gt;

Mr. Samuel,

Pursuant to the Court's Order we have a pretrial scheduling status conference on April 17, 2024. Parties are ordered to file status reports addressing the matters therein no later than 14 days before the conference, which is April 3, 2024. Please let me know your availability next week so we can meet and confer on these topics, including participation in the Court's Voluntary Dispute Resolution Program and consent to the Magistrate Judge. Thank you.

Alexander Cheung  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9305 (Direct)  
415.433.0990 (Main)  
415.434.1370 (Fax)  
[alexander.cheung@wilsonelser.com](mailto:alexander.cheung@wilsonelser.com)

---

**From:** David Samuel <davidsa@possiblymaybe.com>**Sent:** Monday, December 4, 2023 3:13 PM**To:** Swann, Maxine <Maxine.Swann@wilsonelser.com>; Cheung, Alexander <Alexander.Cheung@wilsonelser.com>; Garson, Edward <Edward.Garson@wilsonelser.com>**Subject:** Re: Roberts v. SHRA

**EXTERNAL EMAIL** This email originated from outside the organization.

Maxine,

Actually never mind, this'll do just fine.

David

On Mon, Dec 4, 2023 at 3:11 PM David Samuel &lt;davidsa@possiblymaybe.com&gt; wrote:

Maxine,

Is this a response to the third amended complaint or fourth? The response itself notes the fourth, this email states third.

I should have a fourth amended filed in a couple days, however most of the responses noted here probably aren't going to be relevant to it.

David

On Mon, Dec 4, 2023 at 3:02 PM Swann, Maxine <[Maxine.Swann@wilsonelser.com](mailto:Maxine.Swann@wilsonelser.com)> wrote:

Please see attached Answer of SHRA to plaintiffs' Third Amended Complaint.

Maxine Swann  
Legal Administrative Assistant  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9303 (Direct)  
415.433.0990 (Main)  
415.434.1370 (Fax)  
[maxine.swann@wilsonelser.com](mailto:maxine.swann@wilsonelser.com)

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Thank you.



**David Samuel** <davidsa@possiblymaybe.com>  
To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Mon, Mar 25, 2024 at 2:15 PM

Alexander,

We can conduct any necessary pre-trial discussions via email, and as such we are available at any time.

With regard to magistrate jurisdiction, Plaintiffs decline magistrate jurisdiction in this matter.

With regard to VDRP, Plaintiffs decline VDRP participation.

You/your office filed a document with the court which appears to deny all facts contained in the fourth amended complaint. Given this, are there any stipulations which the defense is willing or able to make?

David  
[Quoted text hidden]

---

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>  
To: David Samuel <davidsa@possiblymaybe.com>  
Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

Mon, Mar 25, 2024 at 2:21 PM

Please "reply all" in all e-mail communications.

[Quoted text hidden]  
[Quoted text hidden]

---

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>  
To: David Samuel <davidsa@possiblymaybe.com>  
Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

Wed, Apr 3, 2024 at 2:58 PM

David,

Pursuant to Federal Rules of Civil Procedure Rule 26, I write to meet and confer with you to schedule a Rule 26(f) conference. Please let me know your availability in the next two weeks.

Thank you.

Alexander Cheung  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9305 (Direct)  
415.433.0990 (Main)  
415.434.1370 (Fax)  
[alexander.cheung@wilsonelser.com](mailto:alexander.cheung@wilsonelser.com)

---

**From:** David Samuel <davidsa@possiblymaybe.com>  
**Sent:** Monday, March 25, 2024 2:15 PM  
**To:** Cheung, Alexander <Alexander.Cheung@wilsonelser.com>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>

Thu, Apr 4, 2024 at 5:01 PM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

Alexander,

We haven't seen any objections to performing the conference via email, and this is the method which would be most accommodating to our needs.

Without conference via email, we would need to arrange transcription services to participate and have yet to determine when that can be arranged.

How much time do you anticipate for the conference?

[Quoted text hidden]

---

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>

Mon, Apr 15, 2024 at 7:52 PM

To: David Samuel <davidsa@possiblymaybe.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

David,

We are required to schedule a conference to discuss the nature of your claims and our defenses, possible settlement, a discovery plan, and arrangement for initial disclosures. The initial disclosures must include information related to witnesses, documents, damages and insurance as laid out by Federal Rule of Civil Procedure, Rule 26.

Given your request to meet and confer by e-mail, please provide information regarding the nature of your claims, possible settlement, and discovery plan. Our status report proposed preliminary pretrial deadlines. We need to discuss arrangements for initial disclosures as well and proposed electronic exchange by e-mail.

I look forward to your responses to the foregoing. Thank you.

[Quoted text hidden]

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>

Tue, Apr 16, 2024 at 9:41 AM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

Alexander,

We should have a discovery plan available for you by Friday at 6pm.

The discovery plan will include timelines for submission of interrogatories of known parties.

50

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>

Tue, Apr 16, 2024 at 10:03 AM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>  
 Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Ferreira, Vieana" <Vieana.Ferreira@wilsonelser.com>

Alexander,

Sorry about that last message, my kid commandeered the keyboard. I will attempt to have a more complete discovery plan by our hearing tomorrow and a working plan by Friday.

David

[Quoted text hidden]

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com> Tue, Apr 16, 2024 at 5:50 PM  
 To: David Samuel <davidsa@possiblymaybe.com>  
 Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Ferreira, Vieana" <Vieana.Ferreira@wilsonelser.com>

David,

I think a discovery plan may make more sense after we engage in our initial disclosures. Under the Federal Rules of Civil Procedure, a party has a limited number of written discovery one may serve on other parties. But we can meet and confer further after I have a chance to review your proposed plan.

[Quoted text hidden]

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com> Tue, Apr 16, 2024 at 9:19 PM  
 To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>  
 Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Ferreira, Vieana" <Vieana.Ferreira@wilsonelser.com>

Okay, I'll read what all that means and get back to you in the next few days.

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com> Wed, Apr 17, 2024 at 8:34 AM  
 To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>  
 Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Ferreira, Vieana" <Vieana.Ferreira@wilsonelser.com>

Alexander,

The majority of our current witness list is either SHRA employees and contractors. We cannot provide the full list as SHRA has not provided the necessary contact information for these individuals.

We need full contact information for:

All individuals who have participated in the "Reasonable Accommodation Compliance Committee" or any variant of the name.

John Lew

All persons who have conducted training regarding the FHA, Rehab Act, or ADA requirements since Jan 1, 2000.

All persons the "Reasonable Accommodation Compliance Committee" may have consulted since Jan 1, 2000.

All persons SHRA has used as hearing officers for administrative hearings since Jan 1, 2000.

I have the current evidence list indexed in a spreadsheet, however quite a few of the documents referenced are HUD and SHRA policy documents and several hundred pages long. Do you require physical copies of all the documents or will PDFs work?

David

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com> Wed, Apr 17, 2024 at 2:17 PM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Sydney Roberts uses the name Maddy, and prefers to be called Maddy in all communication.

Sydney Roberts email address is [maddy@possiblymaybe.com](mailto:maddy@possiblymaybe.com)

Sydney Roberts phone number is (916) 598-3124

Maddy prefers to communicate via email, and there almost certainly be long delays attempting to communicate via phone.

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com>

Wed, Apr 17, 2024 at 2:31 PM

To: "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, "Dulce C. Candy" <maddy@possiblymaybe.com>

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com>

Thu, Apr 18, 2024 at 11:12 AM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>, "Dulce C. Candy" <maddy@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>

Alexander,

I previously mentioned I'd have our initial disclosures to you by Friday, April 19, 2024. Unfortunately, it looks like that will be delayed due to several motions I need to get completed as soon as possible. We will however meet the May 1, 2024 initial disclosure deadline.

After some consideration, it is likely that we will be offering an accelerated schedule, with the goal of beginning trial in early 2025. Are there any objections to this target range?

David

[Quoted text hidden]

**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>

Wed, May 1, 2024 at 6:59 PM

To: David Samuel <davidsa@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>, "King, Kathleen" <Kathleen.King@wilsonelser.com>

David, I will speak with my client regarding the information requested in your e-mail below, and serve supplemental disclosures if necessary. Thank you.

[Quoted text hidden]

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com>

Mon, May 6, 2024 at 7:59 AM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Cc: "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Garson, Edward"

<Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>, "King, Kathleen" <Kathleen.King@wilsonelser.com>

Alexander,

Apologies for this being late, David has had several medical issues over the past month which has required hospitalization and a fairly extensive amount of post visit follow up. We can file a notice to the court explaining the situation and include evidence if necessary.

Please find attached several documents related to the disclosure. If any of these documents are not accessible, we

can send each piecemeal, however all of these documents should already be available to the Defendants.

1. Labeled.zip - File containing our currently disclosed evidence listing. We likely have a second set of disclosures soon but need to understand more about the process first.

2. Initial Disclosure and Potential Witness List

3. Initial Settlement Terms

4. Disclosed Evidence List



Labeled.zip

Thank you for your time.

David and Maddy

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## 2 attachments



**Initial\_Disclosure\_Potential\_Witness\_Information\_05-05-2024.pdf**

44K



**Initial Settlement Terms.pdf**

51K

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**Cheung, Alexander** <Alexander.Cheung@wilsonelser.com>

Tue, May 14, 2024 at 10:47 PM

To: David Samuel <davidsa@possiblymaybe.com>

Cc: "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Garson, Edward"

<Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>, "King, Kathleen"

<Kathleen.King@wilsonelser.com>

David and Sydney,

I briefly reviewed the documents you produced but cannot readily find any documents that explain the computation of each category of damages you are claiming for your claims and settlement demand, which is required for initial disclosures under Federal Rules of Civil Procedure Rule 26. If you produced such documents, can you please point to me which documents you produced are related to your damages? If you have not produced such documents, can you please produce them? We have a settlement conference coming up on June 10, 2024. Are you agreeable to continuing the settlement conference to a later date so we can have sufficient time to evaluate your claimed damages? Please let me know. Thank you.

[Quoted text hidden]

[Quoted text hidden]

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**David Samuel** <davidsa@possiblymaybe.com>

Wed, May 15, 2024 at 12:22 AM

To: "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>

Cc: "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Garson, Edward"

<Edward.Garson@wilsonelser.com>, "Fereira, Vieana" <Vieana.Fereira@wilsonelser.com>, "King, Kathleen"

<Kathleen.King@wilsonelser.com>

Alexander,

We can add an add two additional columns to the master spreadsheet with a "item" and "description" column if that will help clarify. The "item" column will note which of the four items an exhibit is related to. The "description" column will briefly describe which particular statute or regulation it is being introduced to support and how it supports it. For



example, next to exhibit 1 the "description" column will note "admission of RA denial by policy and practice", along with "FHA, ADA" under the "item" column, and next to exhibit 42 the item will note "denial of due process", and "description" will note "admission no hearing officer was available six months post hearing request". If there are questions regarding any particular item, we are happy to describe them.

We also have a second set of disclosures being prepared which we are hoping to have to you by May 20, 2024. With this second set of documents, we'd also like to modify errant exhibit labeling on a few of the already disclosed document. Using exhibit 42 as an example here, it contains the marking "E14-1" and "E14-2" in the upper right corner, these markings will be removed until they are submitted as part of future motions complying with the included exhibit numbering.

We are not interested in delaying the settlement conference as very few of the items were inaccessible to Defendants, and are largely made up of documents and video already in Defendants possession. The documents which the Defendants did not have access to, for example exhibits 4 and 5, serve only to support the factual basis of the statements in the complaint regarding our attempts to contact defendants, and again should be apparent.

The key narrative of this lawsuit is that despite receiving recent organization wide training prior in the year and a half before the alleged acts to settle another lawsuit alleging largely the same types of violations, that the Defendants continue to engage in them because they have economic incentive to do so. The defendants continue to discriminate against protected classes in ways which harm their housing in order to keep their top line spend on the vouchers stable each year despite the underlying housing costs in the Sacramento area more than doubling each year.

In the next set of exhibits which will include SHRA's budgets between 2018 and 2023, we will show that the only way that they could achieve a 1% year over year variation in HCV program spend is by becoming increasingly discriminatory in policy and practice regarding reasonable accommodations, and show that this is supported by items like exhibits 21 and 22 (instituted as part of the recent disability discrimination settlement) which show that despite an increasing ratio of disabled individuals, the defendants denied or ignored a greater portion of requests each year.

I think most of these documents require much more honest conversations with your clients especially since they are documents initiated by them. In exhibit 1 alone it might be of concern as to why they partially cited 24 CFR 982.402 (hint: it's because citing the full regulation contradicts their position), why they acknowledge not engaging in an interactive process prior to denying the request, why they point to general policy rather than an "individualized analysis" as the reasoning for the denial. I would recommend reading through the included HCV guidebook sections as well as city/county occupancy codes for 2022 and compare what those have to say with your client compared to what's in that letter.

The bottom line is that your clients tortured us for a year and a half despite being informed of the situation, being aware of the impending eviction, and having a trivially simple solution to it. Instead they retaliated against us and show no signs at all that they won't continue doing it in the future, meaning our housing stability will once again be at risk when the wind changes over there. They have systemic fraud issues going on with these vouchers over there, we can show with us as an example, that SHRA knowingly suppresses HCV payments to individuals who are receiving county services through other programs, while still billing the county for HCV payments, effectively doubling to tripling the spend on homeless services in Sacramento County just to keep their top line budget stable.

Their willingness to harm both participants and the county/city itself to keep their budget stable resulted in the collapse of Sacramento Self Help Housing, which up until January 2023 was the primary homeless services agency in Sacramento County (<https://californialocal.com/localnews/statewide/ca/article/show/96766-the-collapse-of-sacramento-self-help-housing/>, <https://www.redbluffdailynews.com/2023/03/27/a-sacramento-housing-nonprofit-is-closing-more-than-560-people-could-be-homeless/>). From what evidence I have available, 3/4 of the individuals enrolled in Sacramento County's PRTS program received vouchers that SHRA invented ways to not honor, blowing a massive hole in SSHH's budget and rendering over 200 individuals and counting homeless. This article by Theresa Clift at the Sacramento Bee details (<https://www.aol.com/news/sacramento-program-worked-chronically-homeless-120000161.html>) EXACTLY the same type of behind the scenes awfulness that SHRA has been pushing which killed SSHH, and the only reason it didn't kill NextMove as well is because they are property owners themselves and had a stable enough reserve. At our previous address, 1100 Howe, more than 120 people (AT ONE ADDRESS, <https://www.sacbee.com/news/local/article269536632.html>) were made homeless because SHRA did not properly process HCV vouchers, refused to grant accommodations, and just general screwed over everyone to keep their top level budget spend stable.

The bottom line is that your clients are doing a huge amount of harm and have managed to disguise the amount of active interference they are causing with the city, county, and state's housing policies. They are notoriously awful and petty, and it took a LITERAL FEDERAL LAWSUIT to get them to even consider not being horrible for a moment. A

jury could award \$50 million dollars (we aren't asking for this) and it would save the county money over the next few years by forcing the Board of Supervisors to take more active management of the organization and start asking the hard questions about how their budget managed to stay stable when every other housing initiative around it was literally on fire. The answer isn't because of their excellent management.

David and Maddy

[Quoted text hidden]

EDWARD P. GARSON (SBN 96786)  
[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
 ALEXANDER CHEUNG (SBN 297720)  
[Alexander.Cheung@WilsonElser.com](mailto:Alexander.Cheung@WilsonElser.com)  
**WILSON ELSEER MOSKOWITZ**  
**EDELMAN & DICKER LLP**  
 655 Montgomery Street, Suite 900  
 San Francisco, CA 94111  
 Telephone: (415) 433-0990  
 Facsimile: (415) 434-1370

Attorneys for Defendants SACRAMENTO  
 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANTS' INITIAL DISCLOSURES**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

Defendants SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY ("SHRA");  
 LA SHELLE DOZIER, MARYLIZ PAULSON, TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN, and IBRA HENLY (collectively "Defendants"),  
 make this disclosure in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure.

**PRELIMINARY STATEMENT**

Discovery in this litigation has not yet commenced. Plaintiffs SYDNEY BROOKE  
 ROBERTS and DAVID TYRONE SAMUEL (collectively "Plaintiffs"), and Defendants are still in  
 the initial stages of understanding the nature of the Plaintiffs' claims made against Defendants. To  
 that end, it remains unclear what persons and documents may be relevant to Defendants' defenses,

and thus which persons and documents Defendants must undertake the time, effort, and expense to speak with, gather, and/or analyze. Nonetheless, the instant Initial Disclosure is made in good faith, based upon Defendants' current understanding of the nature of the claims being made against it. To that end, Defendants anticipate further disclosures will be made as the allegations are clarified, and investigation and discovery proceed.

In light of the above, each response provided below is based upon Defendants' belief and understanding at the time the responses were prepared. No incidental or implied admissions are intended, nor should any be construed. Further, Defendants' responses shall not be taken as an admission that Defendants accept the existence of any fact offered or assumed by any disclosure or that such responses constitute admissible evidence. Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the right to amend, supplement, or otherwise modify these disclosures should different, contrary, or additional information become available.

### **INITIAL DISCLOSURES**

#### **A. Rule 26(a)(1)(A)(i)**

Based on the investigation conducted thus far, Defendants are unable to determine the person(s) most likely to have discoverable information that Defendants may use to support its claims or defenses. However, based on information presently available, Defendants identify the following relevant fact witness(es):

(1) Defendant Tanya Cruz, an employee of SHRA and representative of SHRA that attended the informal hearing on September 12, 2022. Defendant Tanya Cruz can be reached through her counsel of record;

(2) Jonathan Lew, the hearing officer for informal hearing on September 12, 2022. Mr. Lew's last known e-mail address is [jonathan.lew@comcast.net](mailto:jonathan.lew@comcast.net).

#### **B. Rule 26(a)(1)(A)(ii)**

Based on information presently available and the investigation conducted thus far, Defendants identify the following categories of documents:

(1) The video recording of the informal hearing on September 12, 2022;

(2) Defendant SHRA's hearing brief and supporting exhibits for the informal hearing on September 12, 2022;

(3) Letter from Defendant SHRA to Plaintiffs, dated March 20, 2023, granting Plaintiffs' request for reasonable accommodations for one additional bedroom;

Without further information from Plaintiffs regarding their specific claims and allegations against Defendants, Defendants are unable to determine additional document(s) which Defendants may use to support their claims or defenses.

Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the right to amend, supplement, or otherwise modify these disclosures should different, contrary, or additional information become available.

**C. Rule 26(a)(1)(A)(iii)**

No damages are claimed by Defendants at this time. This initial disclosure does not waive any right or interest that Defendants may have in asserting any claim for damages, attorney fees, or costs of suit which may be asserted once the merits of the claims asserted against Defendants are adjudicated.

**D. Rule 26(a)(1)(A)(iv)**

Defendants have insurance that provides coverage for some or all aspects of the claims made against it in this litigation.

Dated: May 1, 2024

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By: 

**EDWARD P. GARSON  
ALEXANDER CHEUNG  
Attorneys for Defendants**

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANTS' INITIAL DISCLOSURES**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)


☐: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 1, 2024, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Kathleen King

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
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Attorneys for Defendant,  
 SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT SACRAMENTO HOUSING  
 AND REDEVELOPMENT AGENCY'S  
 REQUESTS FOR PRODUCTION OF  
 DOCUMENTS TO DAVID TYRONE  
 SAMUEL, SET ONE**

Fourth Amended Complaint Filed: April 25, 2023

PROPOUNDING PARTY: Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT  
 AGENCY

RESPONDING PARTY: Plaintiff, DAVID TYRONE SAMUEL

SET NUMBER: One (1)

Defendant SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY hereby  
 requests that DAVID TYRONE SAMUEL serve responses and produce for inspection and copying  
 the following documents, tangible things and writings within the time allotted by law at the Law  
 Offices of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, 655 Montgomery Street, Suite 900,  
 San Francisco, California 94111, (415) 433-0990, pursuant to Rule 34 of the Fed. Rules of Civ. Proc.

///



**DEFINITIONS**

1. The terms “YOU” or “YOUR” means Plaintiff DAVID TYRONE SAMUEL and any attorneys, consultants, experts, investigators, agents, business associates or other persons acting on her behalf thereof.

2. The term “SHRA” means Defendant SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY and its employees.

3. The terms “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning possible under the Federal Rules of Civil Procedure AND shall include, but is not limited to, ANY kind of written, typewritten, printed, electronic, OR recorded material whatsoever, stored in ANY medium AND INCLUDING but not limited to, ANY notes, memoranda, complaints, claims, affidavits, statements, papers, files, forms, data, tapes, cassettes, discs, magnetic cards, printouts, letters, reports, summaries, compilations, chronicles, publications, books, manuals, handbooks, certificates, minutes, agenda, communications, contracts, agreements, telegrams, teletypes, facsimile, records, correspondence, calendars, appointment books, logs, audio OR video recordings AND transcriptions of recordings, microfilm, microfiche, electronically stored information OR representations of ANY kind (INCLUDING but not limited to electronic mail, Internet files, instant messages, internet chat relay, attachments to ANY of the foregoing, voicemail AND other recordings, databases AND ALL electronic file formats) on ANY type of computer readable storage media (INCLUDING but not limited to programs, drives, desktops, laptops, servers, networks, archives, back-up OR disaster recovery systems, magnetic tapes, CDs, DVDs, cartridge media, magneto-optical disks, floppy disks, thumb drives, smart cards, flash memory cards, cellular phones, pagers AND personal data assistants (e.g., iPhones, BlackBerrys, android smart phones), whether OR not ever printed out OR displayed), photographs, pictures, diagrams, OR ANY other writing, however produced OR reproduced, AND further INCLUDING, without limitation, originals, ALL file copies, ALL other copies, no matter how prepared, AND ALL drafts prepared in connection with such DOCUMENTS.

4. The term “COMMUNICATIONS” means ANY oral, written, electronic, OR other exchange of words, thoughts, information, OR ideas to another person OR identity, whether in person, in a group, by telephone, by letter, by Telex, by facsimile, OR by ANY other process, electric, electronic,

OR otherwise. ALL such COMMUNICATIONS in writing shall include, without limitation, printed, typed, handwritten, OR other readable DOCUMENTS, correspondence, memoranda, reports, contracts, drafts (both initial AND subsequent, computer discs OR transmissions, e-mails, instant messages, tape OR video recordings, voicemails, diaries, log books, minutes, notes, studies, surveys AND forecasts, AND ANY AND ALL copies thereof.

5. The term "IDENTIFY" means, when referring to a person, to state the person's full name, business AND residence addresses AND telephone numbers, AND the relation OR affiliation such person had OR has to DEFENDANT; AND when referring to a type of information shall mean to specifically set forth the title of AND DESCRIBE the information in detail so that it can be readily obtained by using the description; AND when referring to a DOCUMENT shall mean to specifically DESCRIBE the DOCUMENT in detail so that the DOCUMENT can readily be obtained by using the description; AND when referring to a THING shall mean to specifically DESCRIBE the THING in detail so that the THING can readily be obtained OR ascertained by using the description. In IDENTIFYING DOCUMENT that was, but no longer is, in YOUR possession, custody, OR control, DESCRIBE the contents of the DOCUMENT; state the date it ceased to be in YOUR possession, custody, OR control; AND IDENTIFY the current custodian of the DOCUMENT.

6. The term "RELATING TO" means containing, constituting, considering, comprising, concerning, discussing, supporting, opposing, regarding, describing, reflecting, studying, commenting or reporting on, mentioning, analyzing, or referring, alluding, or pertaining to, in whole or in part.

### **DOCUMENTS AND ITEMS OR THINGS TO BE PRODUCED:**

#### **REQUEST FOR PRODUCTION NO. 1:**

Produce all DOCUMENTS RELATING TO YOUR First Cause of Action for Denial of Reasonable Accommodation Request.

#### **REQUEST FOR PRODUCTION NO. 2:**

Produce all DOCUMENTS RELATING TO YOUR Second Cause of Action for Due Process Violations.

///

**REQUEST FOR PRODUCTION NO. 3:**

Produce all DOCUMENTS RELATING TO YOUR Third Cause of Action for Discrimination Based on Disability Type.

**REQUEST FOR PRODUCTION NO. 4:**

Produce all DOCUMENTS RELATING TO YOUR Fourth Cause of Action for Denial of Access to Services.

**REQUEST FOR PRODUCTION NO. 5:**

Produce all DOCUMENTS RELATING TO YOUR Fifth Cause of Action for Retaliation of Reasonable Accommodation and Due Process.

**REQUEST FOR PRODUCTION NO. 6:**

Produce all DOCUMENTS RELATING TO YOUR Seventh Cause of Action for Discriminatory Policies and Failure to Prevent Discrimination.

**REQUEST FOR PRODUCTION NO. 7:**

Produce all DOCUMENTS RELATING TO YOUR Reasonable Accommodation Request dated May 19, 2022 and SHRA's denial(s) of the request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 8:**

Produce all COMMUNICATIONS RELATING TO YOUR Reasonable Accommodation Request dated May 19, 2022 and SHRA's denial(s) of the request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 9:**

Produce all DOCUMENTS RELATING TO YOUR damages YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 10:**

Produce all DOCUMENTS RELATING TO YOUR eviction YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 11:**

Produce all DOCUMENTS RELATING TO YOUR homelessness YOU allegedly suffered

as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 12:**

Produce all DOCUMENTS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 13:**

Produce all COMMUNICATIONS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 14:**

Produce all DOCUMENTS RELATING TO the unlawful detainer action entitled, *OP Eleven Hundred LLC v. Sacramento Self Help Housing*, filed in the Superior Court of California, Case No. 22UD04116.

**REQUEST FOR PRODUCTION NO. 15:**

Produce all COMMUNICATIONS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 16:**

Produce all DOCUMENTS RELATING TO YOUR delay and denial of medical treatment for disabilities YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 17:**

Produce all COMMUNICATIONS RELATING TO YOUR delay and denial of medical treatment for disabilities YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 18:**

Produce all DOCUMENTS RELATING TO YOUR disruption to educational progress YOU

1 allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as  
2 alleged in YOUR Complaint.

3 **REQUEST FOR PRODUCTION NO. 19:**

4 Produce all COMMUNICATIONS RELATING TO YOUR disruption to educational  
5 progress YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable  
6 Accommodation Request, as alleged in YOUR Complaint.

7 **REQUEST FOR PRODUCTION NO. 20:**

8 Produce all DOCUMENTS RELATING TO YOUR loss of employment YOU allegedly  
9 suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in  
10 YOUR Complaint.

11 **REQUEST FOR PRODUCTION NO. 21:**

12 Produce all COMMUNICATIONS RELATING TO YOUR loss of employment YOU  
13 allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as  
14 alleged in YOUR Complaint.

15 **REQUEST FOR PRODUCTION NO. 22:**

16 Produce all DOCUMENTS RELATING TO YOUR loss of economic opportunities YOU  
17 allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as  
18 alleged in YOUR Complaint.

19 **REQUEST FOR PRODUCTION NO. 23:**

20 Produce all COMMUNICATIONS RELATING TO YOUR loss of economic opportunities  
21 YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation  
22 Request, as alleged in YOUR Complaint.

23 **REQUEST FOR PRODUCTION NO. 24:**

24 Produce all DOCUMENTS RELATING TO YOUR extreme emotional and physical distress  
25 YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation  
26 Request, as alleged in YOUR Complaint.

27 **REQUEST FOR PRODUCTION NO. 25:**

28 Produce all COMMUNICATIONS RELATING TO YOUR extreme emotional and physical

distress YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 26:**

Produce all DOCUMENTS RELATING TO YOUR compensatory damages requested in Plaintiffs' Complaint.

**REQUEST FOR PRODUCTION NO. 27:**

Produce all DOCUMENTS RELATING TO YOUR punitive damages requested in Plaintiffs' Complaint.

**REQUEST FOR PRODUCTION NO. 28:**

Produce all DOCUMENTS RELATING TO YOUR damages in civil penalties requested in Plaintiffs' Complaint for alleged violations of your rights under the ADA.

**REQUEST FOR PRODUCTION NO. 29:**

Produce all DOCUMENTS RELATING TO YOUR damages in civil penalties requested in Plaintiffs' Complaint for alleged violations of your rights under the FHA.

**REQUEST FOR PRODUCTION NO. 30:**

Produce all DOCUMENTS RELATING TO COMMUNICATIONS with YOUR case worker Ashley Valentine RELATING TO YOUR housing choice voucher and reasonable accommodation requests.

**REQUEST FOR PRODUCTION NO. 31:**

Produce all DOCUMENTS RELATING TO all assistance YOU received from Sacramento Self Help Housing.

**REQUEST FOR PRODUCTION NO. 32:**

Produce all DOCUMENTS RELATING TO all assistance YOU received from Property Related Tenant Services.

**REQUEST FOR PRODUCTION NO. 33:**

Produce all DOCUMENTS RELATING TO all assistance YOU received from Consumers Self Help Center.

///

**REQUEST FOR PRODUCTION NO. 34:**

Produce all DOCUMENTS RELATING TO all assistance YOU received from Flexible Supportive Re-Housing Program.

Dated: August 6, 2024

WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER

By: /s/ Alexander Cheung  
EDWARD P. GARSON  
ALEXANDER CHEUNG  
Attorneys for Defendant  
SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO DAVID TYRONE SAMUEL,  
SET ONE**

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on August 6, 2024, at Rio Vista, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

/s/ Vieana Ferreira  
Vieana Ferreira



**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
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Rio Linda, CA 95673

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[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
ALEXANDER CHEUNG (SBN 297720)  
[Alexander.Cheung@WilsonElser.com](mailto:Alexander.Cheung@WilsonElser.com)  
**WILSON ELSEER MOSKOWITZ**  
**EDELMAN & DICKER LLP**  
655 Montgomery Street, Suite 900  
San Francisco, CA 94111  
Telephone: (415) 433-0990  
Facsimile: (415) 434-1370

Attorneys for Defendant,  
SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT SACRAMENTO HOUSING  
AND REDEVELOPMENT AGENCY'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO SYDNEY BROOKE  
ROBERTS, SET ONE**

Fourth Amended Complaint Filed: April 25, 2023

PROPOUNDING PARTY: Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT  
AGENCY

RESPONDING PARTY: Plaintiff, SYDNEY BROOKE ROBERTS

SET NUMBER: One (1)

Defendant SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY hereby  
requests that SYDNEY BROOKE ROBERTS serve responses and produce for inspection and  
copying the following documents, tangible things and writings within the time allotted by law at the  
Law Offices of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, 655 Montgomery Street, Suite  
900, San Francisco, California 94111, (415) 433-0990, pursuant to Rule 34 of the Fed. Rules of Civ.  
Proc.

**DEFINITIONS**

1. The terms “YOU” or “YOUR” means Plaintiff SYDNEY BROOKE ROBERTS and any attorneys, consultants, experts, investigators, agents, business associates or other persons acting on her behalf thereof.

2. The term “SHRA” means Defendant SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY and its employees.

3. The terms “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning possible under the Federal Rules of Civil Procedure AND shall include, but is not limited to, ANY kind of written, typewritten, printed, electronic, OR recorded material whatsoever, stored in ANY medium AND INCLUDING but not limited to, ANY notes, memoranda, complaints, claims, affidavits, statements, papers, files, forms, data, tapes, cassettes, discs, magnetic cards, printouts, letters, reports, summaries, compilations, chronicles, publications, books, manuals, handbooks, certificates, minutes, agenda, communications, contracts, agreements, telegrams, teletypes, facsimile, records, correspondence, calendars, appointment books, logs, audio OR video recordings AND transcriptions of recordings, microfilm, microfiche, electronically stored information OR representations of ANY kind (INCLUDING but not limited to electronic mail, Internet files, instant messages, internet chat relay, attachments to ANY of the foregoing, voicemail AND other recordings, databases AND ALL electronic file formats) on ANY type of computer readable storage media (INCLUDING but not limited to programs, drives, desktops, laptops, servers, networks, archives, back-up OR disaster recovery systems, magnetic tapes, CDs, DVDs, cartridge media, magneto-optical disks, floppy disks, thumb drives, smart cards, flash memory cards, cellular phones, pagers AND personal data assistants (e.g., iPhones, BlackBerrys, android smart phones), whether OR not ever printed out OR displayed), photographs, pictures, diagrams, OR ANY other writing, however produced OR reproduced, AND further INCLUDING, without limitation, originals, ALL file copies, ALL other copies, no matter how prepared, AND ALL drafts prepared in connection with such DOCUMENTS.

4. The term “COMMUNICATIONS” means ANY oral, written, electronic, OR other exchange of words, thoughts, information, OR ideas to another person OR identity, whether in person, in a group, by telephone, by letter, by Telex, by facsimile, OR by ANY other process, electric, electronic,

OR otherwise. ALL such COMMUNICATIONS in writing shall include, without limitation, printed, typed, handwritten, OR other readable DOCUMENTS, correspondence, memoranda, reports, contracts, drafts (both initial AND subsequent, computer discs OR transmissions, e-mails, instant messages, tape OR video recordings, voicemails, diaries, log books, minutes, notes, studies, surveys AND forecasts, AND ANY AND ALL copies thereof.

5. The term "IDENTIFY" means, when referring to a person, to state the person's full name, business AND residence addresses AND telephone numbers, AND the relation OR affiliation such person had OR has to DEFENDANT; AND when referring to a type of information shall mean to specifically set forth the title of AND DESCRIBE the information in detail so that it can be readily obtained by using the description; AND when referring to a DOCUMENT shall mean to specifically DESCRIBE the DOCUMENT in detail so that the DOCUMENT can readily be obtained by using the description; AND when referring to a THING shall mean to specifically DESCRIBE the THING in detail so that the THING can readily be obtained OR ascertained by using the description. In IDENTIFYING DOCUMENT that was, but no longer is, in YOUR possession, custody, OR control, DESCRIBE the contents of the DOCUMENT; state the date it ceased to be in YOUR possession, custody, OR control; AND IDENTIFY the current custodian of the DOCUMENT.

6. The term "RELATING TO" means containing, constituting, considering, comprising, concerning, discussing, supporting, opposing, regarding, describing, reflecting, studying, commenting or reporting on, mentioning, analyzing, or referring, alluding, or pertaining to, in whole or in part.

### **DOCUMENTS AND ITEMS OR THINGS TO BE PRODUCED:**

#### **REQUEST FOR PRODUCTION NO. 1:**

Produce all DOCUMENTS RELATING TO YOUR First Cause of Action for Denial of Reasonable Accommodation Request.

#### **REQUEST FOR PRODUCTION NO. 2:**

Produce all DOCUMENTS RELATING TO YOUR Second Cause of Action for Due Process Violations.

///

**REQUEST FOR PRODUCTION NO. 3:**

Produce all DOCUMENTS RELATING TO YOUR Third Cause of Action for Discrimination Based on Disability Type.

**REQUEST FOR PRODUCTION NO. 4:**

Produce all DOCUMENTS RELATING TO YOUR Fourth Cause of Action for Denial of Access to Services.

**REQUEST FOR PRODUCTION NO. 5:**

Produce all DOCUMENTS RELATING TO YOUR Fifth Cause of Action for Retaliation of Reasonable Accommodation and Due Process.

**REQUEST FOR PRODUCTION NO. 6:**

Produce all DOCUMENTS RELATING TO YOUR Seventh Cause of Action for Discriminatory Policies and Failure to Prevent Discrimination.

**REQUEST FOR PRODUCTION NO. 7:**

Produce all DOCUMENTS RELATING TO YOUR Reasonable Accommodation Request dated May 19, 2022 and SHRA's denial(s) of the request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 8:**

Produce all COMMUNICATIONS RELATING TO YOUR Reasonable Accommodation Request dated May 19, 2022 and SHRA's denial(s) of the request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 9:**

Produce all DOCUMENTS RELATING TO YOUR damages YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 10:**

Produce all DOCUMENTS RELATING TO YOUR eviction YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 11:**

Produce all DOCUMENTS RELATING TO YOUR homelessness YOU allegedly suffered

as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in YOUR Complaint.

**REQUEST FOR PRODUCTION NO. 12:**

Produce all DOCUMENTS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 13:**

Produce all COMMUNICATIONS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 14:**

Produce all DOCUMENTS RELATING TO the unlawful detainer action entitled, *OP Eleven Hundred LLC v. Sacramento Self Help Housing*, filed in the Superior Court of California, Case No. 22UD04116.

**REQUEST FOR PRODUCTION NO. 15:**

Produce all COMMUNICATIONS RELATING TO the unlawful detainer action entitled, *1860 Howe Ave LLC v. Sacramento Self Help Housing Inc.*, filed in the Superior Court of California, Case No. 23UD01564.

**REQUEST FOR PRODUCTION NO. 16:**

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9 suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as alleged in  
10 YOUR Complaint.

11 **REQUEST FOR PRODUCTION NO. 21:**

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14 alleged in YOUR Complaint.

15 **REQUEST FOR PRODUCTION NO. 22:**

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17 allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation Request, as  
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21 YOU allegedly suffered as a result of SHRA's denial of YOUR Reasonable Accommodation  
22 Request, as alleged in YOUR Complaint.

23 **REQUEST FOR PRODUCTION NO. 24:**

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26 Request, as alleged in YOUR Complaint.

27 **REQUEST FOR PRODUCTION NO. 25:**

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Produce all DOCUMENTS RELATING TO all assistance YOU received from Property Related Tenant Services.

**REQUEST FOR PRODUCTION NO. 33:**

Produce all DOCUMENTS RELATING TO all assistance YOU received from Consumers Self Help Center.

///



1 **REQUEST FOR PRODUCTION NO. 34:**

2 Produce all DOCUMENTS RELATING TO all assistance YOU received from Flexible  
3 Supportive Re-Housing Program.

4  
5 Dated: August 6, 2024

WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER

6  
7 By: /s/ Alexander Cheung  
8 EDWARD P. GARSON  
9 ALEXANDER CHEUNG  
10 Attorneys for Defendant  
11 SACRAMENTO HOUSING AND  
12 REDEVELOPMENT AGENCY  
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**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF SYDNEY BROOKE  
ROBERTS, SET ONE**

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on August 6, 2024, at Rio Vista, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

/s/ Vieana Ferreira  
Vieana Ferreira

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
[maddy@possiblymaybe.com](mailto:maddy@possiblymaybe.com)

Tel: (512) 522-8571  
Tel: (916) 598-3124

## Sheet1

Item Number	Description	File Name
1	Reasonable Accommodation Denial Letter Dated July 08, 2022	(1)_SHRA_RA-Denial_07-16-2022
2	Reasonable Accommodation Request Dated May 19, 2022	(2)_SHRA Reasonable Accomodation(Filled)
3	Note from Dr Medina Supporting May 19, 2022 RA Request	(3)_SHRA_Doctor_note_suppoting_05-19-2022_request
4	T-Mobile Call Logs to SHRA June 2022	(4)_TMobile-Call-Logs_06-2022_Redacted
5	T-Mobile Call Logs to SHRA July 2022	(5)_TMobile-Call-Logs_07-2022_Redacted
6	Email with Dr. Medina confirming SHRA did not contact them regarding RA	(6)_SHRA_No-Contact-With-Doctor_07-20-2022
7	Email chain with Ashley Valentine, Housing Social Worker, Regarding RA requirements and contacts	(7)_Email_Chain-to_Ashley-Valentine-Regarding-RA-Requirements
8	Email chain with Ashley Valentine, Housing Social Worker, Regarding RA status	(8)_Email_Chain-to-Ashley-Valentine-Regarding-Lack-of-RA-Contact_07-11-2022
9	Reasonable Accommodation Denial Letter Dated November 16, 2022	(9)_SHRA_RA-Denial_11-16-2022
10	Reasonable Accommodation Request Dated September 22, 2022	(10)_SHRA-RA_Request_9-22-2022
11	Reasonable Accommodation Denial Dated April 03, 2023	(11)_SHRA-RA_Denial_04-03-2023
12	County of Sacramento HCV Admin Plan 2022	(12)_SHRA_HCV_Admin_2022
13	2020 Voluntary Compliance Agreement	(13)_20Sacramento Housing_CA-VCA_Final (002)
14	Executed Reasonable Accommodation/ADA training agreement per VCA	(14)_Executed_Training_Agreement_2020
15	2022 Expenditure Report	(15)_2022_CAPER_DRAFT_3-3-23
16	Online Callback Request for Reasonable Accommodation, 07-01-2022	(16)_Online_CallBack_Request_Email_Conf_07-01-2022
17	Unlawful Detainer, 10-28-2022	(17)_SSHH_Unlawful-Detainer_SSHH_All-Occupants_10-28-2022
18	Unlawful Detainer, 02-03-2023	(18)_SSHH_Unlawful-Detainer_Notice_02-03-2023
19	Online Appointment Booking for 12-06-2022	(19)_SHRA_Appointment_Booking_for_12-06-2022
20	Online Appointment Booking for 12-06-2022 Cancellation	(20)_SHRA_Online_Appointment_Cancelled_12-06-2022

## Sheet1

21	SHRA ROI With Both Parties noted as Co-Head 06-09-2020	(21)_SHRA_Release_Of_Information_Co-Head_06-09-2020
22	2022 Reasonable Accommodation Dispositions	(22)_RA_Decisions_2022
23	2021 Reasonable Accommodation Dispositions	(23)_RA_Decisions_2021
24	2022 Leasing and Cost Data	(24)_2022_Leasing_and_Cost_Data_redacted
25	2021 Leasing and Cost Data	(25)_2021_Leasing_and_Cost_Data_redacted
26	2020 Leasing and Cost Data	(26)_2020_Leasing_and_Cost_Data_redacted
27	Eviction Writ of Execution for 1100 Howe	(27)_1100-Howe_Writ_of_Execution_9-21-2023
28	Fraudulent Subsidy Notice for 1100 Howe	(28)_HCV_Subsidy_Adjustment_For_1100_Howe.pdf
29	Faxed Hearing Request Confirmation	(29)_Faxed_Hearing_Request_Confirmation_08-04-2022
30	5-17-2022 RA Denial Hearing Request Confirmation	(30)_SHRA_Reasonable-Accommodation-Notice-Of-Hearing-and-Rules_09-02-2022
31	September 12 Hearing Confirmation Email	(31)_SHRA_Reasonable-Accommodation-Hearing-Notice_08-31-2022
32	September 12 Hearing Request Brief via Email	(32)_SHRA_Reasonable_Accommodation_Summary_Brief_09-12-2022
33	April Voucher Renewal Notice of Incomplete Interim	(33)_SHRA_Notice-of-Incomplete-Interim_05-19-2022
34	September 12 Hearing Cancellation Response	(34)_SHRA_Reasonable-Accommodation-Hearing-Cancellation_09-16-2022
35	Response from Supervisor Kennedy's Office Regarding Lack of Response from SHRA re Hearing Request	(35)_SHRA_Response-from-Supervisor-Kennedys-Office_Informal-hearing_08-25-2022
36	First Email Response from SHRA regarding rescheduling Cancelled hearing or a hearing for November 16, 2022 RA denial	(36)_SHRA_Reasonable-Accommodation-Hearing-Response_12-09-2022
37	Email to Supervisor Kennedy's Office Regarding lack of Response from SHRA re Hearing Request	(37)_Supervisor_Kennedy_SHRA_Informal-hearing-Request_08-24-2022
38	November 16, 2022 Reasonable Accommodation Denial Letter	(38)_SHRA_RA_Denial_11-16-2022
39	SHRA Copy of September 29, 2022 Reasonable Accommodation Request	(39)_SHRA_Copy_of_September-29-2022_RA_Request

## Sheet1

40	AIMS Medical Documentation in Support of 09-29-2022 RA Request (Redacted)	(40)_AIMS_ASD_Evaluation_In_Support_of_09-29-2022_RA_Request_Redacted
41	Request for Specific Language from Doctor to Support 5-19-2022 RA Request	(41)_SHRA_Reasonable-Accommodation-Request_Doctors-note-language_05-26-2022
42	Response from SHRA regarding May 19, 2022 Hearing Availability	(42)_February_01_Hearing-Availability_Reasonable-Accommodation_02-01-2023
43	April 20, 2023 Hearing Notification for May 19, 2022 RA Denial	(43)_Notice_of_hearing_for_May-19-2022_RA_Denial_April-20-2023
44	SHRA Hearing Brief/Timeline for April 20, 2023 hearing request	(44)_SHRA_Hearing_Brief_For_April-20-2023_Hearing
45	April 20, 2023 Hearing Notification for May 19, 2022 RA Denial video Part 1	(45)_Video_Part-1_April-20-2023_RA-Hearing
46	April 20, 2023 Hearing Notification for May 19, 2022 RA Denial video Part 2	(46)_Video_Part-2_April-20-2023_RA-Hearing
47	September 12 Hearing Brief Email to Tanya Cruz Requested by Hearing Officer	(47)_SHRA_Hearing-Brief_Email_To_Tanya-Cruz_09-12-2022
48	September 16, 2022 Letter to SHRA/Tanya Cruz responding to September 15, 2022 phone call canceling a hearing decision	(48)_SHRA_Response_to_09-12-2022_Hearing_Cancellation-Email
49	April 20, 2023 Email Response to RA Hearing being Canceled	(49)_SHRA_April-20_Informal-Hearing_Summary_04-20-2023
50	April 03, 2023 Reasonable Accommodation Denial	(50)_SHRA_RA_Denial_April-03-2023
51	March 20, 2023 Reasonable Accommodation Denial	(51)_SHRA-RA_Denial_March-20-2023
52	HCV Guidebook Eligibility Determination	(52)_HCV-Guidebook_Eligibility-Determination_and_Denial-of-Assistance
53	HCV Voucher Issued June 02, 2022	(53)_HCV_Voucher_Good_Standings_06-02-2022
54	March 23, 2023 3 <sup>rd</sup> Voucher Extension Notice	(54)_March-23-2023_3rd-Voucher-Extension_notice
55	HCV Guidebook Payment Standards, 11/2020	(55)_HUD_HCV_Guidebook_Payment_Standards
56	HCV Guidebook Housing Search and Leasing, 11/2020	(56)_HCV_Guidebook_Housing_Search_and_Leasing_November 2020
57	HUD HCV Guidebook Rent Reasonableness, 9/2020	(57)_HCV_Guidebook_Rent_Reasonableness_updated_Sept 2020

## Sheet1

58	HUD Policy Directive 06-06-2016	(58)_PIH2016-09
59	HUD Policy Directive 05-05-2021	(59)_PIH2021-15
60	Joint Statement by HUD and DOJ on Reasonable Accommodations under the FHA	(60)_huddojstatement

EDWARD P. GARSON (SBN 96786)  
[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
 MONICA CASTILLO (SBN 146154)  
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 655 Montgomery Street, Suite 900  
 San Francisco, CA 94111  
 Telephone: (415) 433-0990  
 Facsimile: (415) 434-1370

Attorneys for Defendant,  
 SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT SACRAMENTO HOUSING  
 AND REDEVELOPMENT AGENCY'S  
 REQUESTS FOR ADMISSIONS TO  
 SYDNEY DAVID TYRONE SAMUEL, SET  
 ONE**

Fourth Amended Complaint Filed: April 25, 2023

PROPOUNDING PARTY: Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT  
 AGENCY

RESPONDING PARTY: Plaintiff, DAVID TYRONE SAMUEL

SET NUMBER: One (1)

Pursuant to Rule 36 of the Fed. Rules of Civ. Proc., Defendant SACRAMENTO HOUSING  
 AND REDEVELOPMENT AGENCY requests that Plaintiff DAVID TYRONE SAMUEL answer  
 the following requests for admissions, under oath, within the time permitted by law.

**DEFINITIONS**

1. The terms "YOU" or "YOUR" means Plaintiff DAVID TYRONE SAMUEL and any  
 attorneys, consultants, experts, investigators, agents, business associates or other persons acting on



1 her behalf thereof.

2 2. The term “SHRA” means Defendant SACRAMENTO HOUSING AND  
3 REDEVELOPMENT AGENCY and its employees.

4 3. The terms “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning possible  
5 under the Federal Rules of Civil Procedure AND shall include, but is not limited to, ANY kind of  
6 written, typewritten, printed, electronic, OR recorded material whatsoever, stored in ANY medium  
7 AND INCLUDING but not limited to, ANY notes, memoranda, complaints, claims, affidavits,  
8 statements, papers, files, forms, data, tapes, cassettes, discs, magnetic cards, printouts, letters,  
9 reports, summaries, compilations, chronicles, publications, books, manuals, handbooks, certificates,  
10 minutes, agenda, communications, contracts, agreements, telegrams, teletypes, facsimile, records,  
11 correspondence, calendars, appointment books, logs, audio OR video recordings AND transcriptions  
12 of recordings, microfilm, microfiche, electronically stored information OR representations of ANY  
13 kind (INCLUDING but not limited to electronic mail, Internet files, instant messages, internet chat  
14 relay, attachments to ANY of the foregoing, voicemail AND other recordings, databases AND ALL  
15 electronic file formats) on ANY type of computer readable storage media (INCLUDING but not  
16 limited to programs, drives, desktops, laptops, servers, networks, archives, back-up OR disaster  
17 recovery systems, magnetic tapes, CDs, DVDs, cartridge media, magneto-optical disks, floppy  
18 disks, thumb drives, smart cards, flash memory cards, cellular phones, pagers AND personal data  
19 assistants (e.g., iPhones, BlackBerrys, android smart phones), whether OR not ever printed out OR  
20 displayed), photographs, pictures, diagrams, OR ANY other writing, however produced OR  
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12 DESCRIBE the contents of the DOCUMENT; state the date it ceased to be in YOUR possession,  
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### 18 **REQUESTS FOR ADMISSION**

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13 for violating Plaintiffs rights under the ADA ...adjusted for inflation...or \$207,183 in civil penalties  
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Admit that YOU have no evidence supporting YOUR allegation that SHRA “refused to comply with its own policies” as alleged in YOUR Complaint, ¶ 135.

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Admit that YOUR requested relief for “\$1,000,000 in punitive damages against each party and \$1,000,000 in compensatory damages” (Complaint, ¶ 135) is moot.

**REQUEST FOR ADMISSION NO. 38:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “denied or ignored” all YOUR accessibility requests as alleged in YOUR Complaint, ¶ 137.

**REQUEST FOR ADMISSION NO. 39:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “intentionally made services inaccessible” to YOU as alleged in YOUR Complaint, ¶ 138.

**REQUEST FOR ADMISSION NO. 40:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “continue to make services available in the least accessible manner possible services inaccessible” as alleged in YOUR Complaint, ¶ 139.

**REQUEST FOR ADMISSION NO. 41:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “ignores attempts to access program services” as alleged in YOUR Complaint, ¶ 139.

**REQUEST FOR ADMISSION NO. 42:**

Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against SHRA” (Complaint, ¶ 143) is moot.

**REQUEST FOR ADMISSION NO. 43:**

Admit that YOUR requested relief for “\$103,591 in civil penalties against each named defendant for violating Plaintiffs rights under the ADA ...adjusted for inflation...or \$207,183 in civil penalties

1 if this is a subsequent violation” (Complaint, ¶ 144) is moot.

2 **REQUEST FOR ADMISSION NO. 44:**

3 Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant  
4 for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties  
5 if this is a subsequent violation” (Complaint, ¶ 145) is moot.

6 **REQUEST FOR ADMISSION NO. 47:**

7 Admit that YOU have no evidence supporting YOUR allegation that “SHRA maintains a separate  
8 set of ‘approvable’ reasonable accommodation request depending on the type of disability” as  
9 alleged in YOUR Complaint, ¶ 146.

10 **REQUEST FOR ADMISSION NO. 48:**

11 Admit that YOU have no evidence supporting YOUR allegation that SHRA approves text  
12 communications for hearing impaired individuals as alleged in YOUR Complaint, ¶ 147.

13 **REQUEST FOR ADMISSION NO. 49:**

14 Admit that YOU are not hearing impaired.

15 **REQUEST FOR ADMISSION NO. 50:**

16 Admit that YOU have no evidence supporting YOUR allegation that SHRA allows “a ridiculously  
17 limited type of care to be approved”, as alleged in YOUR Complaint, ¶ 149.

18 **REQUEST FOR ADMISSION NO. 51:**

19 Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against  
20 SHRA” (Complaint, ¶ 153) is moot.

21 **REQUEST FOR ADMISSION NO. 52:**

22 Admit that YOUR requested relief for “\$103,591 in civil penalties against each named defendant  
23 for violating Plaintiffs rights under the ADA ...adjusted for inflation...or \$207,183 in civil penalties  
24 if this is a subsequent violation” (Complaint, ¶ 154) is moot.

25 **REQUEST FOR ADMISSION NO. 53:**

26 Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant  
27 for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties  
28 if this is a subsequent violation” (Complaint, ¶ 155) is moot.

**REQUEST FOR ADMISSION NO. 54:**

Admit that YOU have no evidence that SHRA “forced an ‘under-housed’” condition on YOU, as alleged in your Complaint ¶¶ 156-157.

**REQUEST FOR ADMISSION NO. 55:**

Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against SHRA” (Complaint, ¶ 161) is moot.

**REQUEST FOR ADMISSION NO. 56:**

Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties if this is a subsequent violation” (Complaint, ¶ 162) is moot.

**REQUEST FOR ADMISSION NO. 57:**

Admit that YOU have no evidence that SHRA has continuously discriminated against YOU as alleged in YOUR Complaint, ¶ 163.

Dated: November 4, 2024

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER**

By:



**EDWARD P. GARSON  
MONICA CASTILLO  
Attorneys for Defendant, SACRAMENTO HOUSING  
AND REDEVELOPMENT AGENCY**



**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
 REQUESTS FOR ADMISSION TO PLAINTIFF DAVID TYRONE SAMUEL, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☐: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on November 4, 2024, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 Jasmine Carinio

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)

Tel: (512) 522-8571

EDWARD P. GARSON (SBN 96786)  
[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
 MONICA CASTILLO (SBN 146154)  
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**WILSON ELSER MOSKOWITZ**  
**EDELMAN & DICKER LLP**  
 655 Montgomery Street, Suite 900  
 San Francisco, CA 94111  
 Telephone: (415) 433-0990  
 Facsimile: (415) 434-1370

Attorneys for Defendant,  
 SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

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**DEFENDANT SACRAMENTO HOUSING  
 AND REDEVELOPMENT AGENCY'S  
 REQUESTS FOR ADMISSIONS TO  
 SYDNEY BROOKE ROBERTS, SET ONE**

Fourth Amended Complaint Filed: April 25, 2023

PROPOUNDING PARTY: Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT  
 AGENCY

RESPONDING PARTY: Plaintiff, SYDNEY BROOKE ROBERTS

SET NUMBER: One (1)

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1. The terms "YOU" or "YOUR" means Plaintiff SYDNEY BROOKE ROBERTS and any  
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Admit that YOU have no evidence supporting YOUR allegation that SHRA “intentionally made services inaccessible” to YOU as alleged in YOUR Complaint, ¶ 138.

**REQUEST FOR ADMISSION NO. 40:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “continue to make services available in the least accessible manner possible services inaccessible” as alleged in YOUR Complaint, ¶ 139.

**REQUEST FOR ADMISSION NO. 41:**

Admit that YOU have no evidence supporting YOUR allegation that SHRA “ignores attempts to access program services” as alleged in YOUR Complaint, ¶ 139.

**REQUEST FOR ADMISSION NO. 42:**

Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against SHRA” (Complaint, ¶ 143) is moot.

**REQUEST FOR ADMISSION NO. 43:**

Admit that YOUR requested relief for “\$103,591 in civil penalties against each named defendant for violating Plaintiffs rights under the ADA ...adjusted for inflation...or \$207,183 in civil penalties

1 if this is a subsequent violation” (Complaint, ¶ 144) is moot.

2 **REQUEST FOR ADMISSION NO. 44:**

3 Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant  
4 for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties  
5 if this is a subsequent violation” (Complaint, ¶ 145) is moot.

6 **REQUEST FOR ADMISSION NO. 47:**

7 Admit that YOU have no evidence supporting YOUR allegation that “SHRA maintains a separate  
8 set of ‘approvable’ reasonable accommodation request depending on the type of disability” as  
9 alleged in YOUR Complaint, ¶ 146.

10 **REQUEST FOR ADMISSION NO. 48:**

11 Admit that YOU have no evidence supporting YOUR allegation that SHRA approves text  
12 communications for hearing impaired individuals as alleged in YOUR Complaint, ¶ 147.

13 **REQUEST FOR ADMISSION NO. 49:**

14 Admit that YOU are not hearing impaired.

15 **REQUEST FOR ADMISSION NO. 50:**

16 Admit that YOU have no evidence supporting YOUR allegation that SHRA allows “a ridiculously  
17 limited type of care to be approved”, as alleged in YOUR Complaint, ¶ 149.

18 **REQUEST FOR ADMISSION NO. 51:**

19 Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against  
20 SHRA” (Complaint, ¶ 153) is moot.

21 **REQUEST FOR ADMISSION NO. 52:**

22 Admit that YOUR requested relief for “\$103,591 in civil penalties against each named defendant  
23 for violating Plaintiffs rights under the ADA ...adjusted for inflation...or \$207,183 in civil penalties  
24 if this is a subsequent violation” (Complaint, ¶ 154) is moot.

25 **REQUEST FOR ADMISSION NO. 53:**

26 Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant  
27 for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties  
28 if this is a subsequent violation” (Complaint, ¶ 155) is moot.

**REQUEST FOR ADMISSION NO. 54:**

Admit that YOU have no evidence that SHRA “forced an ‘under-housed’” condition on YOU, as alleged in your Complaint ¶¶ 156-157.

**REQUEST FOR ADMISSION NO. 55:**

Admit that YOUR requested relief for “\$200,000 in compensatory and punitive damages against SHRA” (Complaint, ¶ 161) is moot.

**REQUEST FOR ADMISSION NO. 56:**

Admit that YOUR requested relief for “\$115,054 in civil penalties against each named defendant for violating Plaintiffs rights under the FHA ...adjusted for inflation...or \$230,107 in civil penalties if this is a subsequent violation” (Complaint, ¶ 162) is moot.

**REQUEST FOR ADMISSION NO. 57:**

Admit that YOU have no evidence that SHRA has continuously discriminated against YOU as alleged in YOUR Complaint, ¶ 163.

Dated: November 4, 2024

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER**

By:



**EDWARD P. GARSON  
MONICA CASTILLO  
Attorneys for Defendant, SACRAMENTO HOUSING  
AND REDEVELOPMENT AGENCY**

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
 REQUESTS FOR ADMISSION TO PLAINTIFF SYDNEY BROOKE ROBERTS, SET  
 ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☐: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on November 4, 2024, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Jasmine Carinio

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)

Tel: (512) 522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
Case No. 2-22-cv-01699

DAVID SAMUEL and SYDNEY ROBERTS,  
Plaintiffs,

v.

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY,  
Defendant.

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**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT**

Pursuant to **Rule 34 of the Federal Rules of Civil Procedure**, Plaintiffs **David Samuel and Sydney Roberts**, pro se, request that Defendant **Sacramento Housing and Redevelopment Agency** ("**SHRA**") produce the following documents and things for inspection and copying within **thirty (30) days** of service of this request.

**DEFINITIONS**

1. "You" or "Defendant" refers to **Sacramento Housing and Redevelopment Agency (SHRA)**, its agents, employees, and any other individuals acting on its behalf.
  2. "Reasonable accommodation" refers to any request made under the **Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA)** for a modification or exception to SHRA's rules, policies, or procedures due to disability.
  3. "Hearing" refers to any informal grievance hearing, informal hearing, or appeal process required by **24 CFR § 982.555** and SHRA's policies.
  4. "Document" shall mean all written, recorded, or electronic materials, including but not limited to emails, letters, memos, policies, reports, meeting minutes, notes, and recordings.
- 

**REQUESTS FOR PRODUCTION**

**SHRA's Denial of Plaintiffs' Reasonable Accommodation Request**

1. **All documents related to Plaintiffs' request for a reasonable accommodation, including but not limited to** applications, internal correspondence, approval/denial letters, case notes, and any supporting documentation.
2. **All communications (emails, letters, text messages, or memos) between SHRA employees, agents, or representatives** concerning Plaintiffs' reasonable accommodation request.

3. **Any and all internal policies, manuals, or training materials** regarding the process for reviewing and deciding reasonable accommodation requests from 2019 to present.
4. **All logs, databases, or records of reasonable accommodation requests received by SHRA** from 2019 to the present, including whether the requests were granted or denied.

#### **Failure to Provide an Informal Hearing**

5. **All notices, letters, or emails sent to Plaintiffs regarding the scheduling or cancellation of their informal hearings.**
6. **All internal communications (emails, meeting notes, or memos) among SHRA employees** regarding the scheduling, postponement, or cancellation of Plaintiffs' informal hearings.
7. **All written policies or procedures regarding SHRA's obligation to provide an informal hearing** after denying a reasonable accommodation request.
8. **Any and all training materials provided to SHRA employees** regarding compliance with 24 CFR § 982.555 and the process for conducting informal hearings.
9. **All documents, recordings, or transcripts from Plaintiffs' scheduled hearings, including records of when and why the hearings were cancelled.**
10. **Any internal reports, audits, or assessments conducted by SHRA** regarding compliance with HUD-mandated hearing procedures.

#### **Pattern and Practice of Denying Due Process**

11. **All records of other informal hearings SHRA scheduled and later cancelled from 2019 to the present,** including the reason for cancellation.
12. **All complaints, grievances, or lawsuits filed against SHRA** in the past five years alleging failure to provide an informal hearing.
13. **Any investigations, audits, or findings from HUD, DOJ, or other agencies** regarding SHRA's compliance with fair housing and due process requirements.
14. **Any internal or external communications related to policy changes, training, or remedial action SHRA has taken** as a result of previous hearing-related complaints or investigations.

#### **Effective Communication and Notice Issues**

15. **All policies and procedures governing how SHRA notifies tenants of their right to request an informal hearing.**
16. **All versions of forms, notices, or written guidance given to tenants regarding their hearing rights and deadlines.**
17. **All communications between SHRA and HUD or other housing agencies regarding required procedures for informal hearings.**

### **Reasonable Accommodation Committee and Compliance Oversight**

18. **All documents identifying the members of SHRA's Reasonable Accommodation Committee or Reasonable Accommodation Compliance Committee**, including their names, job titles, roles, and tenure.
19. **All meeting agendas, notes, minutes, or schedules** showing how often the Reasonable Accommodation Committee meets, including dates of meetings from 2019 to the present.
20. **All documents reviewed, referenced, or discussed by the Reasonable Accommodation Committee** in evaluating reasonable accommodation requests, including evaluation criteria, checklists, or policy references.
21. **All internal policies, procedures, or guidelines governing the operations, purpose, and authority of the Reasonable Accommodation Committee.**

### **Telephone Records Related to Accommodation Requests**

22. **All incoming and outgoing call logs, messages, or call recordings related to SHRA's designated reasonable accommodation telephone number from 2020 to the present.**

### **Hearing Officer Retention and Communications**

23. **All documents related to the recruitment, retention, appointment, or contracting of informal hearing officers used by SHRA from 2019 to the present.**
24. **A list including the names, titles, and contact information for all individuals who have served as informal hearing officers for SHRA in the last five years.**
25. **All communications, including emails or memos, between or among SHRA employees and informal hearing officers regarding Plaintiffs' informal hearings.**

## **INSTRUCTIONS**

- **If any document is withheld under a claim of privilege**, Defendant must provide a privilege log identifying the document, its date, author, recipient, and the specific privilege claimed.
- **If Defendant is unable to locate a requested document**, Defendant must state in writing the efforts made to locate the document.
- **Documents should be produced in electronic form (PDF, Word, or native format) where possible.**
- **If any documents are redacted, Defendant must provide an explanation for the redaction.**

Dated: 04/03/2025

**David Samuel**  
**Sydney Roberts**  
 Plaintiffs, Pro Se



**David Samuel**  
**Sydney Roberts**  
108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571

04/08/2025

**Edward P. Garson, Esq.**  
**Monica Castillo, Esq.**  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery Street, Suite 900  
San Francisco, CA 94111

**Re: Samuel & Roberts v. Sacramento Housing and Redevelopment Agency**  
**Case No. 2-22-cv-01699 (E.D. Cal.)**

Dear Mr. Garson and Ms. Castillo:

Pursuant to ongoing discovery in the above-captioned matter, Plaintiffs respectfully request that Defendant Sacramento Housing and Redevelopment Agency (SHRA) provide the following information:

1. **The names, job titles, and current positions of all individuals who have served as members of SHRA's Reasonable Accommodation Compliance Committee (RACC)** from 2019 to the present. This request relates to the identification of DOE defendants involved in the evaluation and decision-making regarding Plaintiffs' reasonable accommodation requests.
2. **The names and business contact information for all third-party companies, consultants, contractors, or internal departments that have provided rental market analysis** or contributed to SHRA's rent reasonableness determinations since January 1, 2020. This includes any tools, reports, or software used to assess rent comparability or set subsidy limits.
3. **The names, job titles, and employment or contractor status of all housing inspectors** who have been employed by or contracted with SHRA from January 1, 2020, to the present. This includes inspectors responsible for Housing Quality Standards (HQS) inspections, special inspections, or any inspections associated with the Housing Choice Voucher program.
4. **The names, job titles, and responsibilities of all individuals or departments responsible for developing, updating, or maintaining SHRA's inventory of accessible housing units for individuals with disabilities**, including any obligations to track, promote, or coordinate placement in accessible units as outlined in HUD regulations.

Please provide the requested information within fourteen (14) days of the date of this letter. If additional time is needed, kindly provide a proposed response date. If any part of this information is being withheld under a claim of privilege, please state the basis of the claim and provide a corresponding privilege log.

Thank you for your continued cooperation.

Sincerely,

**David Samuel**

**Sydney Roberts**

Plaintiffs, Pro Se

April 9, 2025

Monica Castillo  
415.625.9372 (direct)  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)

**VIA E-MAIL ONLY**

David Samuel  
Sydney Roberts  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
[home@possiblymaybe.com](mailto:home@possiblymaybe.com)

Re: *Brooke Roberts, et al v. Sacramento Housing and Redevelopment Agency, et al.* USDC, Eastern District of California, Case No. 2:22-cv-01699 TLN AC PS  
Our File No: 21727.00057

Dear Mr. Samuel and Ms. Roberts:

This is in response to your recent correspondence requesting a Rule 26(f) conference and service of your Request for Production of Documents.

As you know, we served you with our Rule 26(f) Disclosures on May 1, 2024. On May 6, 2024, you served a “Witness List” and an “Evidence List” apparently purporting to comply with the Rule 26(f) disclosure requirements.

On or about August 6, 2024, we served you with Requests for Production of Documents. On or about November 4, 2024, we served you with Requests for Admissions and Special Interrogatories. Having received no responses, we filed our Motion for Summary Judgment, which, as you know, is under submission for the court to rule on.

In light of the foregoing, we see no need to undergo a Rule 26 conference.

It is also unreasonable to serve discovery requests on our client when you have failed to respond to any of the discovery we served upon you. However, if the court denies our Motion for Summary Judgment, we will comply and timely serve responses.

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655 Montgomery Street, Suite 900 | San Francisco, CA 94111 | p 415.433.0990 | f 415.434.1370 | [wilsonelser.com](http://wilsonelser.com)

Albany, NY | Atlanta, GA | Austin, TX | Baltimore, MD | Birmingham, AL | Boston, MA | Charlotte, NC | Chicago, IL | Dallas, TX | Denver, CO | Detroit, MI | Long Island, NY  
Hartford, CT | Houston, TX | Indianapolis, IN | Jackson, MS | Las Vegas, NV | London, England | Los Angeles, CA | Louisville, KY | Madison, NJ | McLean, VA | Merrillville, IN  
Miami, FL | Milwaukee, WI | Nashville, TN | New Orleans, LA | New York, NY | Orange County, CA | Orlando, FL | Philadelphia, PA | Phoenix, AZ | Portland, OR | Raleigh, NC  
San Diego, CA | San Francisco, CA | Sarasota, FL | Seattle, WA | Stamford, CT | St. Louis, MO | Tyler, TX | Washington, DC | West Palm Beach, FL | White Plains, NY



If you would like to discuss this further, I am available to speak next week.

Best regards,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in blue ink that reads 'Monica Castillo'. The signature is written in a cursive, flowing style.

Monica Castillo

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel, et al.,

Plaintiffs,

Case No. 2:22-cv-01699 DJC AC

Sacramento Housing & Redevelopment Agency, et al.,

Defendants.

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Pursuant to Federal Rules of Civil Procedure 33 and 36, Plaintiffs hereby propound the following interrogatories and requests for admission to Defendant LaShelle Dozier, to be answered separately and fully in writing and under oath within thirty (30) days of service hereof. These requests are continuing in nature, and Defendant is hereby requested to supplement her responses as required by Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

1. The term 'SHRA' refers to the Sacramento Housing and Redevelopment Agency and all agents, employees, officers, attorneys, and representatives acting on its behalf.
2. The term 'You' or 'Your' refers to LaShelle Dozier.
3. The term 'Communication' includes any transmission of information, whether oral, written, electronic, or otherwise.
4. Each response shall be made under oath and shall include all information available to You, including information in the possession of Your agents, attorneys, or representatives.
5. If You object to any request, identify the nature of the objection and respond to the extent the request is not objectionable.
6. These requests are deemed continuing, and You must timely supplement Your responses pursuant to Rule 26(e).

**Interrogatories**

Interrogatory No. 1:

Describe in detail your current duties and responsibilities as Executive Director of SHRA, including your supervisory authority over SHRA's Housing Choice Voucher program and any role you play in reviewing or approving policies related to participant accommodations or informal hearings.

Interrogatory No. 2:

Identify the dates and roles of all positions you have held at SHRA, including your role as Director or Manager of the Housing Choice Voucher (HCV) unit. For each position, describe your responsibilities regarding policy development and compliance monitoring.

Interrogatory No. 3:

Describe the policies and procedures in effect between 2020 and 2024 regarding how SHRA schedules, conducts, records, and resolves informal hearings under 24 C.F.R. § 982.555.

Interrogatory No. 4:

Describe the procedures used by SHRA to ensure that participants with disabilities receive effective communication and access to services, including what auxiliary aids or reasonable modifications are offered in hearings or inspections.

Interrogatory No. 5:

Identify all individuals who served on SHRA's Reasonable Accommodation Committee between 2020 and 2024, and describe their roles, responsibilities, and qualifications.

Interrogatory No. 6:

Describe the grievance and appeal process available to Housing Choice Voucher participants who allege discrimination, denial of access to services, or denial of hearing rights.

Interrogatory No. 7:

State whether you received or reviewed any direct communications from Plaintiffs in 2022 or 2023 regarding informal hearing delays, denial of accommodations, or disability discrimination, and describe any actions you took or directed others to take.

Interrogatory No. 8:

Identify all internal SHRA memoranda, training materials, or guidance documents issued from 2020 to 2024 regarding due process obligations under 24 C.F.R. § 982.555 and the ADA.

Interrogatory No. 9:

Describe SHRA's policies from 2020 to 2024 for handling multiple RFTA submissions by a voucher holder and whether exceptions were allowed as a reasonable accommodation.

Interrogatory No. 10:

Identify any oversight reports, audits, or compliance reviews SHRA received from HUD between 2020 and 2024 that identified concerns about informal hearing practices or disability access.

Interrogatory No. 11:

Identify all emails, letters, or communications received by you from Plaintiffs or their representatives between 2022 and 2024 regarding allegations of disability discrimination, denial of due process, or failure to accommodate.

## Interrogatory No. 12:

Describe any steps you personally took, or directed others to take, in response to the multiple emails and communications you received from Plaintiffs in 2023 alleging disability discrimination, failure to accommodate, denial of access to program services, voiding of RFTAs, or cancellation of informal hearings. Include dates and individuals involved in evaluating or responding to each concern.

## Interrogatory No. 13:

Identify any SHRA internal procedures in effect between 2020 and 2024 requiring that staff escalate unresolved accommodation requests or civil rights complaints to your office or the Executive Director.

## Interrogatory No. 14:

Describe the policies in place at SHRA for investigating staff misconduct, retaliation, or failure to comply with the ADA, Section 504, or Title VI.

## Interrogatory No. 15:

State whether SHRA has ever disciplined, reassigned, or retrained any employee based on a substantiated finding of discrimination or failure to accommodate between 2018 and 2024. If so, identify the employee(s), nature of misconduct, and resulting action.

### Requests for Admission

## RFA No. 1:

Admit that SHRA is a public entity subject to Title II of the Americans with Disabilities Act.

## RFA No. 2:

Admit that you are the signatory on SHRA's Voluntary Compliance Agreement with HUD dated March 12, 2020.

## RFA No. 3:

Admit that the Voluntary Compliance Agreement requires SHRA to provide effective communication and accessible grievance procedures under Section 504 and the ADA.

## RFA No. 4:

Admit that SHRA failed to complete or issue a written decision following Plaintiffs' informal hearing originally scheduled for April 20, 2023 (and held on June 2, 2023), and also failed to issue a decision after their prior hearing held on September 12, 2022.

## RFA No. 5:

Admit that SHRA had knowledge that Plaintiffs had moved to a new address and yet continued to issue housing assistance payments to a landlord at their former residence for over one year.

## RFA No. 6:

Admit that you received at least one email directly from Plaintiffs during 2022 or 2023 regarding a request for hearing access, real-time transcription, or another disability-

related accommodation.

RFA No. 7:

Admit that Plaintiffs notified you of concerns regarding discrimination or cancellation of hearings in violation of 24 C.F.R. § 982.555 and ADA Title II.

RFA No. 8:

Admit that SHRA did not provide Plaintiffs with an opportunity to inspect their case file prior to one or more scheduled informal hearings.

RFA No. 9:

Admit that as Executive Director, you had authority to intervene, escalate, or override procedural decisions regarding informal hearings or reasonable accommodation denials.

RFA No. 10:

Admit that SHRA does not have a written policy requiring that reasonable accommodation complaints or hearing cancellations be logged and tracked by Executive Management or Human Resources.

RFA No. 11:

Admit that you personally received one or more emails from Plaintiffs in 2023 requesting reasonable accommodations related to "rent reasonableness," informal hearing access, and communication by email.

RFA No. 12:

Admit that despite receiving multiple written complaints and accommodation requests from Plaintiffs, SHRA did not provide written notice of denial, did not issue formal explanations for adverse actions, and did not complete or schedule requested hearings within the timelines described in SHRA's administrative plan.



## Interrogatories and Requests for Admission to LaShelle Dozier – Set Two

### 📌 Set Two: Interrogatories and RFAs to LaShelle Dozier (Items 11–20)

### #### INTERROGATORIES

#### Interrogatory No. 11:

Identify all emails, letters, or communications received by you from Plaintiffs or their representatives between 2022 and 2024 regarding allegations of disability discrimination, denial of due process, or failure to accommodate.

#### Interrogatory No. 12:

Describe any steps you personally took, or directed others to take, in response to the multiple emails and communications you received from Plaintiffs in 2023 alleging disability discrimination, failure to accommodate, denial of access to program services, voiding of RFTAs, or cancellation of informal hearings. Include dates and individuals involved in evaluating or responding to each concern.

#### Interrogatory No. 13:

Identify any SHRA internal procedures in effect between 2020 and 2024 requiring that staff escalate unresolved accommodation requests or civil rights complaints to your office or the Executive Director.

#### Interrogatory No. 14:

Describe the policies in place at SHRA for investigating staff misconduct, retaliation, or failure to comply with the ADA, Section 504, or Title VI.

#### Interrogatory No. 15:

State whether SHRA has ever disciplined, reassigned, or retrained any employee based on a substantiated finding of discrimination or failure to accommodate between 2018 and 2024. If so, identify the employee(s), nature of misconduct, and resulting action.

#### REQUESTS FOR ADMISSION

RFA No. 6:

Admit that you received at least one email directly from Plaintiffs during 2022 or 2023 regarding a request for hearing access, real-time transcription, or another disability-related accommodation.

RFA No. 7:

Admit that Plaintiffs notified you of concerns regarding discrimination or cancellation of hearings in violation of 24 C.F.R. § 982.555 and ADA Title II.

RFA No. 8:

Admit that SHRA did not provide Plaintiffs with an opportunity to inspect their case file prior to one or more scheduled informal hearings.

RFA No. 9:

Admit that as Executive Director, you had authority to intervene, escalate, or override procedural decisions regarding informal hearings or reasonable accommodation denials.

RFA No. 10:

Admit that SHRA does not have a written policy requiring that reasonable accommodation complaints or hearing cancellations be logged and tracked by Executive Management or Human Resources.

RFA No. 11:

Admit that you personally received one or more emails from Plaintiffs in 2023 requesting reasonable accommodations related to "rent reasonableness," informal hearing access, and communication by email.

RFA No. 12:

Admit that despite receiving multiple written complaints and accommodation requests from Plaintiffs, SHRA did not provide written notice of denial, did not issue formal explanations for adverse actions, and did not complete or schedule requested hearings within the timelines described in SHRA's administrative plan.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel, et al.,

Plaintiffs,

Case No. 2:22-cv-01699 DJC AC

Sacramento Housing & Redevelopment Agency, et al.,

Defendants.

---

Pursuant to Federal Rules of Civil Procedure 33 and 36, Plaintiffs hereby propound the following interrogatories and requests for admission to Defendant MaryLiz Paulson, to be answered separately and fully in writing and under oath within thirty (30) days of service hereof. These requests are continuing in nature, and Defendant is hereby requested to supplement her responses as required by Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

1. The term 'SHRA' refers to the Sacramento Housing and Redevelopment Agency and all agents, employees, officers, attorneys, and representatives acting on its behalf.
2. The term 'You' or 'Your' refers to MaryLiz Paulson.
3. The term 'Communication' includes any transmission of information, whether oral, written, electronic, or otherwise.
4. Each response shall be made under oath and shall include all information available to You, including information in the possession of Your agents, attorneys, or representatives.
5. If You object to any request, identify the nature of the objection and respond to the extent the request is not objectionable.
6. These requests are deemed continuing, and You must timely supplement Your responses pursuant to Rule 26(e).

[Interrogatories](#)

## Plaintiffs' First Set of Interrogatories and Requests for Admission to MaryLiz Paulson

### INTERROGATORIES

Interrogatory No. 1:

Identify your current title, responsibilities, and role at SHRA, including your authority

over reasonable accommodation procedures, the Housing Choice Voucher program, and any compliance obligations under Section 504 of the Rehabilitation Act or Title II of the Americans with Disabilities Act.

Interrogatory No. 2:

Identify all job titles and roles you have held within SHRA since 2018 and describe the responsibilities associated with each position.

Interrogatory No. 3:

State whether you are or have been designated as SHRA's Section 504 Coordinator pursuant to 24 C.F.R. § 8.53(a) and PIH Notice 2010-26, and if not, identify the person(s) who served in that capacity during your employment.

Interrogatory No. 4:

Describe your role in reviewing, approving, or denying reasonable accommodation requests submitted by program participants between 2022 and 2024.

Interrogatory No. 5:

Identify all individuals who served on SHRA's Reasonable Accommodation Committee between 2020 and 2024, and describe their titles, roles, and the process used by the Committee to review requests.

Interrogatory No. 6:

Identify the training you have received between 2020 and 2024 regarding your obligations under Section 504, the ADA, the Fair Housing Act, and California civil rights laws.

Interrogatory No. 7:

Describe the procedures in effect at SHRA from 2020 through 2024 for documenting, responding to, and providing written decisions for reasonable accommodation requests.

Interrogatory No. 8:

Describe the procedures in effect at SHRA from 2020 through 2024 for responding to complaints about informal hearing cancellations, failure to accommodate communication needs, or failure to provide case file access prior to hearings.

Interrogatory No. 9:

Identify each reasonable accommodation request submitted by Plaintiffs that you reviewed, participated in, or denied, including the date of request, the decision, and the reason for denial.

Interrogatory No. 10:

Identify any complaints, concerns, or internal warnings brought to your attention

between 2020 and 2024 alleging discrimination or noncompliance with Section 504 or the ADA by SHRA staff or contractors.

### Requests for Admission

RFA No. 1:

Admit that you are the signatory on multiple reasonable accommodation denial letters issued to Plaintiffs between 2022 and 2023.

RFA No. 2:

Admit that SHRA's 2020 Voluntary Compliance Agreement with HUD requires the designation of a Section 504 Coordinator and mandates compliance with 24 C.F.R. § 8.53.

RFA No. 3:

Admit that SHRA has not consistently provided written notice of reasonable accommodation denials to Plaintiffs.

RFA No. 4:

Admit that SHRA has denied reasonable accommodation requests submitted by Plaintiffs without conducting an individualized assessment of their disability-related needs.

RFA No. 5:

Admit that Plaintiffs submitted multiple requests for communication accommodations (including email, real-time transcription, and captioning) which were either denied or ignored.

RFA No. 6:

Admit that SHRA has cancelled or failed to conduct multiple informal hearings requested by Plaintiffs without issuing a written explanation or decision.

RFA No. 7:

Admit that as the HCV Program Manager and participant in the Reasonable Accommodation Committee, you had authority to intervene in accommodation decisions made by subordinate SHRA staff.

RFA No. 8:

Admit that SHRA policy does not expressly require tracking of informal hearing cancellations or accommodation denials in a centralized database accessible by executive management.

VERIFICATION

I, \_\_\_\_\_, declare under penalty of perjury that I am authorized to make this verification for and on behalf of Defendant MaryLiz Paulson and that I have read the foregoing responses to Plaintiffs' Interrogatories and Requests for Admission and know the contents thereof. The same are true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

Executed on \_\_\_\_\_, 2025 at \_\_\_\_\_.

\_\_\_\_\_  
Signature of Responding Party

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel, et al.,

Plaintiffs,

Case No. 2:22-cv-01699 DJC AC

Sacramento Housing & Redevelopment Agency, et al.,

Defendants.

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Pursuant to Federal Rules of Civil Procedure 33 and 36, Plaintiffs hereby propound the following second set of interrogatories and requests for admission to Defendant MaryLiz Paulson, to be answered separately and fully in writing and under oath within thirty (30) days of service hereof. These requests are continuing in nature, and Defendant is hereby requested to supplement her responses as required by Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

1. The term 'SHRA' refers to the Sacramento Housing and Redevelopment Agency and all agents, employees, officers, attorneys, and representatives acting on its behalf.
2. The term 'You' or 'Your' refers to MaryLiz Paulson.
3. The term 'Communication' includes any transmission of information, whether oral, written, electronic, or otherwise.
4. Each response shall be made under oath and shall include all information available to You, including information in the possession of Your agents, attorneys, or representatives.
5. If You object to any request, identify the nature of the objection and respond to the extent the request is not objectionable.
6. These requests are deemed continuing, and You must timely supplement Your responses pursuant to Rule 26(e).

Interrogatories

## Plaintiffs' Second Set of Interrogatories and Requests for Admission to MaryLiz Paulson

### INTERROGATORIES

Interrogatory No. 11:



Identify all emails, letters, or communications you received from Plaintiffs in 2022 or 2023 regarding reasonable accommodations, effective communication, hearing access, or allegations of discrimination.

Interrogatory No. 12:

Describe any steps you personally took, or directed others to take, in response to complaints from Plaintiffs regarding the cancellation of hearings, refusal to provide auxiliary aids, or denial of housing opportunities.

Interrogatory No. 13:

Identify all requests made by Plaintiffs for effective communication formats (such as email correspondence, real-time transcription, captioning, or written confirmation of verbal notices), and state whether each request was granted or denied.

Interrogatory No. 14:

Describe SHRA's process for logging, tracking, and reviewing complaints of disability-based discrimination or failure to accommodate, including who has access to that tracking system and how those complaints are escalated.

Interrogatory No. 15:

State whether you have reviewed HUD guidance documents including PIH 2010-26, PIH 2012-31, or the SHRA 2020 Voluntary Compliance Agreement, and describe how SHRA has implemented or failed to implement the required reforms.

### Requests for Admission

RFA No. 9:

Admit that you personally received one or more emails from Plaintiffs requesting reasonable accommodations and hearing access.

RFA No. 10:

Admit that you were made aware, in writing, of Plaintiffs' request for communication accommodations including the use of email and real-time captioning.

RFA No. 11:

Admit that Plaintiffs' requests for communication accommodations were not consistently honored by SHRA.

RFA No. 12:

Admit that SHRA failed to reschedule or complete at least two informal hearings requested by Plaintiffs.

RFA No. 13:

Admit that SHRA failed to provide Plaintiffs with written decisions or explanations following one or more denied reasonable accommodation requests.

RFA No. 14:

Admit that SHRA does not maintain a centralized or accessible database to log and monitor reasonable accommodation denials.

RFA No. 15:

Admit that you were aware of HUD's findings or guidance related to SHRA's obligations under Section 504 and the ADA as of 2020.

VERIFICATION

I, \_\_\_\_\_, declare under penalty of perjury that I am authorized to make this verification for and on behalf of Defendant MaryLiz Paulson and that I have read the foregoing responses to Plaintiffs' Interrogatories and Requests for Admission and know the contents thereof. The same are true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

Executed on \_\_\_\_\_, 2025 at \_\_\_\_\_.

\_\_\_\_\_  
Signature of Responding Party

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel, et al.,

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

Sacramento Housing & Redevelopment Agency, et al.,

Defendants.

---

Pursuant to Federal Rules of Civil Procedure 33 and 36, Plaintiffs hereby propound the following first set of interrogatories and requests for admission to Defendant Ibra Henley, to be answered separately and fully in writing and under oath within thirty (30) days of service hereof. These requests are continuing in nature, and Defendant is hereby requested to supplement her responses as required by Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

1. The term 'SHRA' refers to the Sacramento Housing and Redevelopment Agency and all agents, employees, officers, attorneys, and representatives acting on its behalf.
2. The term 'You' or 'Your' refers to Ibra Henley.
3. The term 'Communication' includes any transmission of information, whether oral, written, electronic, or otherwise.
4. Each response shall be made under oath and shall include all information available to You, including information in the possession of Your agents, attorneys, or representatives.
5. If You object to any request, identify the nature of the objection and respond to the extent the request is not objectionable.
6. These requests are deemed continuing, and You must timely supplement Your responses pursuant to Rule 26(e).

Interrogatories

## Plaintiffs' First Set of Interrogatories and Requests for Admission to Ibra Henley

### INTERROGATORIES

Interrogatory No. 1:

Identify your current job title and describe your responsibilities at SHRA, including your

role in the informal hearing process and in the review, analysis, or recommendation of reasonable accommodation requests.

Interrogatory No. 2:

State all job titles you have held within SHRA since 2018, the dates of each position, and your responsibilities with respect to Housing Choice Voucher (HCV) hearings or accommodations for persons with disabilities.

Interrogatory No. 3:

Describe your role in coordinating, scheduling, or participating in any informal hearing requested by Plaintiffs between 2022 and 2024.

Interrogatory No. 4:

Identify all reasonable accommodation requests submitted by Plaintiffs that you reviewed, analyzed, responded to, or were copied on, including the date of the request, any communication with staff or supervisors, and your recommendations or determinations.

Interrogatory No. 5:

State whether you have received any formal training between 2020 and 2024 regarding your responsibilities under the Fair Housing Act (FHA), Americans with Disabilities Act (ADA), Rehabilitation Act, or California civil rights statutes such as FEHA or CDPA.

Interrogatory No. 6:

Describe your understanding of SHRA's obligations to provide reasonable accommodations in its HCV program and informal hearings, and explain your role in evaluating whether an accommodation is supported by medical or nexus documentation.

Interrogatory No. 7:

State whether you have ever made statements, either verbally or in writing, suggesting that a voucher participant's disability was fake, exaggerated, or unsupported, including the date and circumstances of such statements.

Interrogatory No. 8:

Describe SHRA's process for identifying and investigating staff misconduct or bias related to the handling of disability accommodations, and identify whether you have been the subject of any complaint, review, or supervisory directive related to such conduct.

Interrogatory No. 9:

Identify all persons with whom you discussed Plaintiffs' reasonable accommodation requests, the substance of those discussions, and whether any SHRA policy or practice

was cited as a reason for denying or delaying action.

Interrogatory No. 10:

Describe how you distinguish between conducting a neutral administrative review and advocating for SHRA's interest in opposing or denying an accommodation request.

### Requests for Admission

RFA No. 1:

Admit that you are responsible for coordinating or administering informal hearings for Housing Choice Voucher participants at SHRA.

RFA No. 2:

Admit that you personally reviewed or responded to at least one reasonable accommodation request submitted by Plaintiffs.

RFA No. 3:

Admit that you are not a licensed medical professional or social worker.

RFA No. 4:

Admit that you have questioned the validity of Plaintiffs' disability or need for accommodation during SHRA's internal discussions.

RFA No. 5:

Admit that SHRA has not issued a written decision following one or more informal hearings or hearing requests submitted by Plaintiffs.

RFA No. 6:

Admit that you did not provide Plaintiffs with advance access to their case file before one or more informal hearings.

RFA No. 7:

Admit that you have previously made or been reported for making statements suggesting that voucher participants exaggerate or fabricate disability claims to obtain benefits.

RFA No. 8:

Admit that you did not take steps to ensure that Plaintiffs' communication accommodation requests were implemented prior to a hearing or adverse action.

RFA No. 9:

Admit that SHRA did not consistently evaluate Plaintiffs' accommodation requests based

on individualized assessment or HUD guidance.

RFA No. 10:

Admit that you acted on behalf of SHRA in a manner intended to advocate for denial of Plaintiffs' requested accommodation.

VERIFICATION

I, \_\_\_\_\_, declare under penalty of perjury that I am authorized to make this verification for and on behalf of Defendant Ibra Henley and that I have read the foregoing responses to Plaintiffs' Interrogatories and Requests for Admission and know the contents thereof. The same are true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

Executed on \_\_\_\_\_, 2025 at \_\_\_\_\_.

\_\_\_\_\_  
Signature of Responding Party



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel, et al.,

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

Sacramento Housing & Redevelopment Agency, et al.,

Defendants.

---

Pursuant to Federal Rules of Civil Procedure 33 and 36, Plaintiffs hereby propound the following second set of interrogatories and requests for admission to Defendant Ibra Henley, to be answered separately and fully in writing and under oath within thirty (30) days of service hereof. These requests are continuing in nature, and Defendant is hereby requested to supplement her responses as required by Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

1. The term 'SHRA' refers to the Sacramento Housing and Redevelopment Agency and all agents, employees, officers, attorneys, and representatives acting on its behalf.
2. The term 'You' or 'Your' refers to Ibra Henley.
3. The term 'Communication' includes any transmission of information, whether oral, written, electronic, or otherwise.
4. Each response shall be made under oath and shall include all information available to You, including information in the possession of Your agents, attorneys, or representatives.
5. If You object to any request, identify the nature of the objection and respond to the extent the request is not objectionable.
6. These requests are deemed continuing, and You must timely supplement Your responses pursuant to Rule 26(e).

Interrogatories

## Plaintiffs' Second Set of Interrogatories and Requests for Admission to Ibra Henley

### INTERROGATORIES

Interrogatory No. 11:

Identify all emails, text messages, internal notes, or case file entries created by you

regarding Plaintiffs' informal hearing requests or reasonable accommodation requests between 2022 and 2024.

Interrogatory No. 12:

Describe the process by which you determine whether a participant's claimed disability or accommodation need is legitimate, including any criteria or sources of authority you rely on.

Interrogatory No. 13:

Identify all staff members you consulted or communicated with regarding Plaintiffs' accommodation or hearing requests, and describe the substance of each discussion.

Interrogatory No. 14:

State whether you are aware of SHRA policies or practices that limit or delay processing of accommodation requests involving multiple RFTAs, rent reasonableness exceptions, or housing requests outside designated zip codes.

Interrogatory No. 15:

Describe all complaints, legal claims, or grievances you are aware of involving allegations of disability discrimination or due process violations during your tenure at SHRA, whether filed by Plaintiffs or others.

### Requests for Admission

RFA No. 11:

Admit that you were notified that Plaintiffs requested that all communication be provided in writing or by email as an effective communication accommodation.

RFA No. 12:

Admit that you or SHRA provided verbal notice or left voice mail messages relating to adverse housing decisions despite Plaintiffs' repeated objections to this method of communication.

RFA No. 13:

Admit that you did not personally ensure communication accommodations were in place for at least one hearing or adverse decision.

RFA No. 14:

Admit that SHRA has no formal procedure for pre-hearing review of accommodation requests by a neutral party not involved in denial decisions.

RFA No. 15:

Admit that your role in reviewing accommodation requests includes identifying reasons

to deny nexus or documentation rather than neutrally evaluating whether the request is reasonable.

RFA No. 16:

Admit that SHRA has not issued written findings for one or more of Plaintiffs' hearing requests.

RFA No. 17:

Admit that SHRA's administrative procedures do not require case file access to be granted in advance of informal hearings.

RFA No. 18:

Admit that you have received complaints from tenants, advocates, or other agencies alleging disability discrimination or failure to accommodate by SHRA staff.

VERIFICATION

I, \_\_\_\_\_, declare under penalty of perjury that I am authorized to make this verification for and on behalf of Defendant Ibra Henley and that I have read the foregoing responses to Plaintiffs' Interrogatories and Requests for Admission and know the contents thereof. The same are true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

Executed on \_\_\_\_\_, 2025 at \_\_\_\_\_.

\_\_\_\_\_  
Signature of Responding Party

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.

LA SHELLE DOZIER, in her individual capacity;

MARYLIZ PAULSON, in her individual capacity;

IBRA HENLEY, in her individual capacity;

LEAH SHAW, in her individual capacity;

TAMEKA JACKSON, in her individual capacity;

TROY LYNCH, in his individual capacity,

Defendants.

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PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSION  
TO DEFENDANT TROY LYNCH

Sydney Roberts

### INTERROGATORIES

Interrogatory No. 1:

Identify your current job title, responsibilities, and role within SHRA, including any supervision responsibilities over hearing officers or accommodation staff.

Interrogatory No. 2:

Identify all job titles you have held at SHRA since 2018 and describe the duties

associated with each position, especially with regard to informal hearings or accommodation review.

Interrogatory No. 3:

Describe your involvement in any training or oversight of Tanya Cruz during the 2022 or 2023 calendar years, including any documents authored or reviewed in connection with her participation in the Plaintiffs' hearings.

Interrogatory No. 4:

Identify all dates you were scheduled to appear or did appear for any hearing involving Plaintiffs, including the September 12, 2022 and June 2, 2023 proceedings.

Interrogatory No. 5:

Describe the role you played during the June 2, 2023 hearing, including any decisions made, instructions given, or documents reviewed before or after the hearing.

Interrogatory No. 6:

State whether you are or were at any time between 2020 and 2024 a member of the SHRA Reasonable Accommodation Committee. If so, describe your role and participation in the review or denial of accommodation requests submitted by Plaintiffs.

Interrogatory No. 7:

Describe any communication you had with other SHRA staff between July 2022 and July 2023 about Plaintiffs, their accommodation requests, or hearing scheduling. Identify participants, dates, and the substance of each communication.

Interrogatory No. 8:

Identify and describe any internal notes, memoranda, or summaries you prepared or received regarding the hearings involving Plaintiffs, and whether those records were shared with the Plaintiffs.

### ### REQUESTS FOR ADMISSION

RFA No. 1:

Admit that you were present at the June 2, 2023 hearing involving Plaintiffs.

RFA No. 2:

Admit that you supervised or provided training to Tanya Cruz with regard to SHRA informal hearing procedures in 2022 or 2023.

RFA No. 3:

Admit that you were aware of Plaintiffs' request for real-time captioning or transcription for one or more hearings.

RFA No. 4:

Admit that SHRA did not issue a written decision following the September 12, 2022

hearing.

RFA No. 5:

Admit that SHRA did not issue a written decision following the June 2, 2023 hearing.

RFA No. 6:

Admit that you participated in or attended one or more SHRA Reasonable Accommodation Committee meetings between 2022 and 2023 where Plaintiffs' requests were discussed.

RFA No. 7:

Admit that you authored or received communications related to Plaintiffs' hearing access, accommodation requests, or complaints.

RFA No. 8:

Admit that you did not provide Plaintiffs access to their case file prior to one or more scheduled hearings.

Dated: April 14, 2025

Sydney Roberts

108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.

LA SHELLE DOZIER, in her individual capacity;

MARYLIZ PAULSON, in her individual capacity;

IBRA HENLEY, in her individual capacity;

LEAH SHAW, in her individual capacity;

TAMEKA JACKSON, in her individual capacity;

TROY LYNCH, in his individual capacity;

TANYA CRUZ, in her individual capacity,

Defendants.

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PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSION  
TO DEFENDANT TANYA CRUZ

Sydney Roberts

### INTERROGATORIES

Interrogatory No. 1:

Identify your current job title and responsibilities at SHRA, including your role in processing or overseeing informal hearings and reasonable accommodation requests.



Interrogatory No. 2:

List all positions you have held at SHRA since 2018, including dates and descriptions of duties.

Interrogatory No. 3:

Describe your involvement in the informal hearings scheduled for Plaintiffs on September 12, 2022 and April 20, 2023, including your actions before, during, and after each hearing.

Interrogatory No. 4:

Identify all communications you had with SHRA staff or hearing officers regarding the April 20, 2023 hearing and the decision to cancel or reschedule it.

Interrogatory No. 5:

Describe your understanding of who had the authority to cancel the April 20, 2023 hearing, and the basis for your statement that the hearing would be rescheduled.

Interrogatory No. 6:

State whether you were aware of Plaintiffs' request for a real-time transcription or other communication accommodation for the April 20, 2023 hearing, and explain what actions you took in response.

Interrogatory No. 7:

Identify all SHRA policies or procedures you relied on when denying, deferring, or modifying Plaintiffs' accommodation requests or participation in informal hearings.

Interrogatory No. 8:

Identify and describe any internal records, notes, memos, or hearing summaries you authored or reviewed related to Plaintiffs between July 2022 and July 2023.

### ### REQUESTS FOR ADMISSION

RFA No. 1:

Admit that you attended the April 20, 2023 hearing involving Plaintiffs.

RFA No. 2:

Admit that you informed Plaintiffs during the April 20, 2023 hearing that the hearing would be cancelled and rescheduled.

RFA No. 3:

Admit that you did not provide Plaintiffs with a written decision or explanation for the cancellation of the April 20, 2023 hearing.

RFA No. 4:

Admit that you were aware of and did not provide real-time transcription or text-based

communication accommodations requested by Plaintiffs.

RFA No. 5:

Admit that you did not ensure Plaintiffs had access to their case file before one or more scheduled hearings.

RFA No. 6:

Admit that you participated in internal SHRA discussions about Plaintiffs' hearing requests or accommodations between 2022 and 2023.

RFA No. 7:

Admit that you received or reviewed complaints, objections, or requests for clarification from Plaintiffs related to the April 20, 2023 hearing.

RFA No. 8:

Admit that you stated or implied during the April 20, 2023 hearing that the cancellation decision was not subject to Plaintiffs' objection or further review.

Dated: April 14, 2025

Sydney Roberts

108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.

LA SHELLE DOZIER, in her individual capacity;

MARYLIZ PAULSON, in her individual capacity;

IBRA HENLEY, in her individual capacity;

LEAH SHAW, in her individual capacity;

TAMEKA JACKSON, in her individual capacity;

TROY LYNCH, in his individual capacity;

TANYA CRUZ, in her individual capacity;

LISA MACIAS, in her individual capacity,

Defendants.

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PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSION  
TO DEFENDANT LISA MACIAS

Sydney Roberts

### INTERROGATORIES

Interrogatory No. 1:

Identify your job title and responsibilities at SHRA as of May and June 2022, including

your role in processing reasonable accommodation requests or receiving documents from third-party representatives.

Interrogatory No. 2:

Describe your interactions or communications with Ashley Valentine of Sacramento Self Help Housing (SSHH) regarding Plaintiffs' case or any accommodation-related documentation submitted on their behalf.

Interrogatory No. 3:

Identify any documents or materials you received or were copied on from Plaintiffs or SSHH between April 2022 and July 2022 concerning reasonable accommodation, RFTA processing, or document verification.

Interrogatory No. 4:

State whether you were assigned to respond to any incoming calls, emails, or voicemail messages from Plaintiffs or SSHH during the period from April 1, 2022 to July 1, 2022.

Interrogatory No. 5:

Describe SHRA's internal procedures in place at that time for handling voicemail messages directed to housing staff, and whether you had a personal or shared voicemail system.

Interrogatory No. 6:

Identify any complaints, technical reports, or capacity issues affecting your voicemail inbox between April and July 2022.

Interrogatory No. 7:

Describe any forwarding, scanning, or routing procedures you followed for materials submitted by Plaintiffs or Ashley Valentine, including the identity of SHRA staff you forwarded documents to.

### ### REQUESTS FOR ADMISSION

RFA No. 1:

Admit that you were the SHRA point of contact for Ashley Valentine of Sacramento Self Help Housing concerning Plaintiffs' case in or around May 2022.

RFA No. 2:

Admit that you received one or more voicemail messages or email communications from Ashley Valentine in May 2022.

RFA No. 3:

Admit that your voicemail inbox was full and unable to receive new messages at one or more times in May 2022.

RFA No. 4:

Admit that you did not return one or more calls or emails from Plaintiffs or their representative between April and June 2022.

RFA No. 5:

Admit that you received at least one document submission or drop box notice from Plaintiffs or their representative during that period.

RFA No. 6:

Admit that you did not send a written acknowledgment or confirmation of receipt to Plaintiffs or their representative.

RFA No. 7:

Admit that your failure to respond contributed to delays in processing Plaintiffs' reasonable accommodation or housing paperwork in May or June 2022.

Dated: April 14, 2025

Sydney Roberts

108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.

LA SHELLE DOZIER, in her individual capacity;

MARYLIZ PAULSON, in her individual capacity;

IBRA HENLEY, in her individual capacity;

LEAH SHAW, in her individual capacity;

TAMEKA JACKSON, in her individual capacity;

TROY LYNCH, in his individual capacity;

TANYA CRUZ, in her individual capacity;

LISA MACIAS, in her individual capacity;

TIFFANY BROWN, in her individual capacity,

Defendants.

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PLAINTIFFS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSION  
TO DEFENDANT TIFFANY BROWN

Sydney Roberts

### INTERROGATORIES

Interrogatory No. 1:

Identify your job title and responsibilities at SHRA between January 1, 2022 and July 1, 2022, particularly with regard to the intake, routing, or screening of reasonable accommodation requests.

Interrogatory No. 2:

Describe any communications you had with Ashley Valentine of Sacramento Self Help Housing or any SHRA staff member about documents submitted on behalf of Plaintiffs related to housing or accommodation.

Interrogatory No. 3:

Identify all documents, faxes, or electronic submissions referencing Plaintiffs or their representative that you personally received, scanned, logged, or forwarded between March and June 2022.

Interrogatory No. 4:

Describe any role you played in processing or confirming receipt of RA documentation submitted through SHRA's online portal or dropbox in that timeframe.

Interrogatory No. 5:

State whether you maintained or monitored any shared intake voicemail or email accounts that may have received messages related to Plaintiffs' accommodation or hearing requests.

Interrogatory No. 6:

Identify any SHRA employees you referred or forwarded Plaintiffs' materials to, and describe the method and timing of the forwarding.

### ### REQUESTS FOR ADMISSION

RFA No. 1:

Admit that you received one or more documents or messages from or concerning Plaintiffs between March and June 2022.

RFA No. 2:

Admit that you did not personally notify Plaintiffs or their representative that the documents had been received.

RFA No. 3:

Admit that you did not follow up with SHRA supervisory staff to ensure that Plaintiffs' RA request was being reviewed.

RFA No. 4:

Admit that you took no action to confirm that Plaintiffs' RA request had been forwarded to the appropriate party.

RFA No. 5:

Admit that your failure to confirm or log the receipt of Plaintiffs' documents contributed to delays in their accommodation review.

Dated: April 14, 2025

Sydney Roberts

108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.

LA SHELLE DOZIER, in her individual capacity;

MARYLIZ PAULSON, in her individual capacity;

IBRA HENLEY, in her individual capacity;

LEAH SHAW, in her individual capacity;

TAMEKA JACKSON, in her individual capacity,

Defendants.

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PLAINTIFFS' FIRST COMBINED INTERROGATORIES AND REQUESTS FOR PRODUCTION  
TO DEFENDANT TAMEKA JACKSON

Sydney Roberts

### INTERROGATORIES

Interrogatory No. 1:

Identify all employees who received or were forwarded any email or fax message from or on behalf of Plaintiffs by you between July 1, 2022 and October 1, 2022. For each such individual, describe their role and responsibilities.

Interrogatory No. 2:

Identify all SHRA employees or agents referred to as "upstairs" in SHRA internal

communications or by you during the 2022 informal hearing scheduling process.

Interrogatory No. 3:

Describe SHRA's policies and procedures in effect between June 2022 and September 2022 for handling requests to schedule informal hearings following reasonable accommodation denials, including the steps staff were required to take when receiving such a request.

Interrogatory No. 4:

Identify the name, position, and current contact information of any individual(s) responsible for managing or monitoring the SHRA Reasonable Accommodation phone line during the period from January 1, 2022 to September 30, 2022.

Interrogatory No. 5:

Describe any known issues, complaints, or functionality limitations with the SHRA Reasonable Accommodation phone line between January 1, 2022 and September 30, 2022, including whether the voicemail was full, unmonitored, or disconnected during that time.

### ### REQUESTS FOR PRODUCTION

Request No. 1:

Produce all emails, faxes, or other written communications authored by or received by you between July 1, 2022 and October 1, 2022 regarding Plaintiffs, the scheduling of a hearing, or the forwarding of Plaintiffs' materials to SHRA staff.

Request No. 2:

Produce the email or document you sent confirming the September 12, 2022 hearing.

Request No. 3:

Produce any communications, notes, or memos referencing the "reasonable accommodation phone line" or indicating that you attempted to reach or refer Plaintiffs to it.

Request No. 4:

Produce any internal audit reports, help desk logs, or staff emails discussing technical issues, outages, or voicemail capacity problems associated with the SHRA Reasonable Accommodation phone line from January 1, 2022 to September 30, 2022.

Request No. 5:

Produce any recorded voicemail greetings, transcriptions, or system settings in use on the SHRA Reasonable Accommodation phone line during the same period.

Note: Defendant may redact personally identifying information of non-party tenants if required by law, provided that redactions are clearly marked and described.

Dated: April 14, 2025

Sydney Roberts

108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com  
(512) 522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

David Samuel and Sydney Roberts,

Plaintiffs,

v. Case No. 2:22-cv-01699 DJC AC

Sacramento Housing and Redevelopment Agency,

Defendant.

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PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs David Samuel and Sydney Roberts, pro se, request that Defendant Sacramento Housing and Redevelopment Agency ("SHRA") produce the following documents and materials for inspection and copying within thirty (30) days of service of this request.

### DEFINITIONS

1. "You" or "Defendant" refers to Sacramento Housing and Redevelopment Agency (SHRA), its agents, employees, and any other individuals acting on its behalf.
2. "Leah Shaw" refers to the SHRA employee using the email address lshaw@shra.org and includes all actions taken by her within the scope of her employment.
3. "Affordability" and "Rent Reasonableness" refer to any evaluation, screening, or approval process used to determine whether a proposed rental unit may be approved under HUD Housing Choice Voucher program rules, including all determinations based on payment standards or market comparisons.
4. "Arbors units" refers to the properties in Sacramento associated with the Plaintiffs' Request for Tenancy Approvals (RFTAs) in or around March and April 2023.

### REQUESTS FOR PRODUCTION

Note: Defendant may redact personally identifying information of non-party tenants if required by law, provided that the redactions are clearly noted in the production.

1. All documents, emails, or internal correspondence authored by or sent to Leah Shaw from January 1, 2023 to May 30, 2023 that relate to the Arbors units, the Plaintiffs, or the denial or delay of RFTA processing.
2. All internal guidelines, memoranda, job descriptions, or training materials describing Leah Shaw's job duties as they relate to affordability determinations or RFTA approval processes.
3. All emails, messages, or memos between Leah Shaw and any third-party contractor or data vendor used by SHRA for affordability analysis, from 2022 to the present.
4. All contracts, memoranda of understanding (MOUs), or service agreements with third-party vendors, contractors, or data providers used by SHRA for affordability or rent reasonableness analysis from 2020 to the present.
5. All documents explaining or defining how long an affordability determination is expected to take under SHRA's current policies, including any internal performance benchmarks.
6. Any logs, reports, or tracking data showing how long it took to complete affordability analysis for the Arbors units in Plaintiffs' case, including date of submission, date of analysis, and date of final decision or rejection.
7. All communications between Leah Shaw and members of SHRA's Reasonable Accommodation Committee that refer to the Plaintiffs, their disability status, or affordability exceptions between January 1, 2022 and December 31, 2024.
8. All policies or procedures explaining whether and how SHRA staff may override, delay, or reopen affordability determinations made using third-party data tools.
9. Any documents that describe when or why an affordability determination might be delayed more than 14 days, including explanations related to software, manual review, or supervisory intervention.
10. All drafts, notes, or internal comments prepared by Leah Shaw regarding the Plaintiffs' RFTA submissions, including any versions not provided to the Plaintiffs.

Dated: April 14, 2025

David Samuel  
Sydney Roberts  
Plaintiffs, Pro Se

April 13, 2025

Monica Castillo  
415.625.9372 (direct)  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)

**VIA E-EMAIL ONLY**

David Samuel  
Sydney Roberts  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
[home@possiblymaybe.com](mailto:home@possiblymaybe.com)

Re: *Brooke Roberts, et al v. Sacramento Housing and Redevelopment Agency, et al.* USDC, Eastern District of California, Case No. 2:22-cv-01699 TLN AC PS  
Our File No: 21727.00057

Dear Mr. Samuel and Ms. Roberts:

This is in response to your April 14, 2025 correspondence.

To clarify, our responses to the discovery you propounded, pursuant to FRCP, is due thirty (30) days after service of the discovery, which we will certainly follow absent a need for an extension.. In my correspondence of April 9, 2025, I was referring to the April 23, 2025 date for our Motion for Summary Judgment which, if granted, will obviate the need for responses to discovery.

Best regards,

Wilson Elser Moskowitz Edelman & Dicker LLP



Monica Castillo



David Samuel &lt;davidsa@possiblymaybe.com&gt;

---

**Roberts v. SHRA; Response to Pltfs re discovery 04.13.2025; 21727.00057**

2 messages

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Sun, Apr 13, 2025 at 9:48 AM

To: "davidsa@possiblymaybe.com" &lt;davidsa@possiblymaybe.com&gt;, "home@possiblymaybe.com" &lt;home@possiblymaybe.com&gt;

Cc: "Castillo, Monica" &lt;Monica.Castillo@wilsonelser.com&gt;

Mr. Samuels:

Please see attached correspondence.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

IMPORTANT NOTICE: Beware of Cyber Fraud.

You should NEVER wire money to any bank account that Wilson Elser Moskowitz Edelman & Dicker LLP provides to you either in the body of this or any email or in an attachment without first speaking with the attorney in our office who is handling your transaction. Further, DO NOT accept emailed wire instructions from anyone else without voice verification. Even if an email looks like it has come from this office or someone involved in your transaction, CALL US FIRST AT A NUMBER YOU KNOW TO BE CORRECT FOR THIS OFFICE to verify the information before wiring any money. Failure to do so is at your own risk. Be particularly wary of any request to change wire instructions you have already received.

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at [www.wilsonelser.com](http://www.wilsonelser.com) or refer to any of our offices.

Thank you.



**Response to Pltfs' re discovery 04.13.2025(311581445.1).pdf**

79K

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**David Samuel** <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Sun, Apr 13, 2025 at 11:17 AM

We appreciate your confirmation that SHRA will respond to the outstanding discovery requests within the timeframe required by the Federal Rules. To avoid any ambiguity, we note that no discovery stay is in effect, and a pending motion for summary judgment does not relieve the parties of their Rule 26 and Rule 34 obligations.

We also write to clarify the record in light of Defendants' April 10, 2025 letter, which stated an intent to withhold discovery entirely. To the extent Defendants fail to serve timely and complete responses within 30 days of service, we reserve all rights to seek appropriate relief under Rule 37, including a motion to compel and related sanctions.

[Quoted text hidden]





David Samuel <davidsa@possiblymaybe.com>

---

## Motion to Compel Rule 26 Conference

5 messages

---

**David Samuel** <davidsa@possiblymaybe.com>

Wed, Apr 9, 2025 at 12:23 PM

To: monica.castillo@wilsonelser.com, "Garson, Edward" <edward.garson@wilsonelser.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Please find attached our motion to compel the rule 26 conference



**Motion\_to\_compel\_Rule\_26\_conference\_04-09-2025\_With\_POS\_Evidence.pdf**

1300K

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**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Wed, Apr 9, 2025 at 12:32 PM

To: David Samuel <davidsa@possiblymaybe.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Cc: "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Mr. Samuel:

We are in receipt of your Motion. However, there is no hearing date indicated on your moving papers, as required by FRCP Rule 6.

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <davidsa@possiblymaybe.com>

**Sent:** Wednesday, April 9, 2025 12:23 PM

**To:** Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>; Garson, Edward <[Edward.Garson@wilsonelser.com](mailto:Edward.Garson@wilsonelser.com)>; Maddy, David and Artemis Samuel <[home@possiblymaybe.com](mailto:home@possiblymaybe.com)>; Barbara McGarvey <[sea@possiblymaybe.com](mailto:sea@possiblymaybe.com)>

**Subject:** Motion to Compel Rule 26 Conference

**EXTERNAL EMAIL** This email originated from outside the organization.

Please find attached our motion to compel the rule 26 conference

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You should NEVER wire money to any bank account that Wilson Elser Moskowitz Edelman & Dicker LLP provides to you either in the body of this or any email or in an attachment without first speaking with the attorney in our office who is handling your transaction. Further, DO NOT accept emailed wire instructions from anyone else without voice verification. Even if an email looks like it has come from this office or someone involved in your transaction, CALL US FIRST AT A NUMBER YOU KNOW TO BE CORRECT FOR THIS OFFICE to verify the information before wiring any money. Failure to do so is at your own risk. Be particularly wary of any request to change wire instructions you have already received.

CONFIDENTIALITY NOTICE: This electronic message is intended to be viewed only by the individual or entity to whom it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this communication is strictly prohibited without our prior permission. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or if you have received this communication in error, please notify us immediately by return e-mail and delete the original message and any copies of it from your computer system.

For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at [www.wilsonelser.com](http://www.wilsonelser.com) or refer to any of our offices.

Thank you.

---

David Samuel <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Thu, Apr 10, 2025 at 11:12 AM

Monica,

Thanks for pointing that out.

[Quoted text hidden]

---

Castillo, Monica <Monica.Castillo@wilsonelser.com>  
To: David Samuel <davidsa@possiblymaybe.com>  
Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Fri, Apr 11, 2025 at 10:41 AM

Mr. Samuel:

As you know, on April 17, 2024, the parties participated in a Pre-Trial Scheduling Conference held before Magistrate Judge Clair, where scheduling was discussed. As a result, on April 18, 2024, Magistrate Claire issued a Scheduling Order setting the deadline for Initial Disclosures (timely completed by the parties) and **discovery due by June 25, 2025**, along with other deadlines.

FRCP R. 26(f)(1) requires a scheduling conference "...21 days before a scheduling conference is to be

held or a scheduling order is due under Rule 16(b).”

Thus, your Motion to Compel a Rule 26(f) Conference is moot. The April 17, 2024, Pre-Trial Scheduling Conference, and subsequent order, preempts the need for a R. 26(f) conference.

Please confirm that you will withdraw your motion.

Thank you,

[Quoted text hidden]

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Fri, Apr 11, 2025 at 12:00 PM

Hi Monica,

We don't agree that the motion is moot, but we'll let the court determine whether a meaningful Rule 26(f) conference was satisfied.

Thanks,  
David

[Quoted text hidden]

David Samuel  
Sydney Roberts  
108 Rinetti Way  
Rio Linda, CA 95673  
(512) 522-8571  
davidsa@possiblymaybe.com

April 16, 2025

Monica Castillo, Esq.  
Edward Garson, Esq.  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery Street, Suite 900  
San Francisco, CA 94111

RE: Request for Identification of SHRA Rule 30(b)(6) Designees

Dear Counsel,

Pursuant to the Federal Rules of Civil Procedure and in anticipation of a formal Rule 30(b)(6) deposition notice, Plaintiffs request that Defendants identify the individual(s) most knowledgeable concerning the following subject areas within SHRA's operations during the period of 2020–2024. Plaintiffs reserve the right to issue a formal deposition notice following identification of designees and their availability.

1. Voucher Processing and Approval Timelines:

- Average time to approve RFTAs
- Factors affecting delay or denial
- Differences by unit size or requesting party

2. Geographic and Demographic Distribution of Voucher Outcomes:

- Approval rates by zip code
- Use of zip code-level racial or income data in approval decisions
- Any internal review or policy tied to zip code trends or geographic clustering

3. Use of Market Analysis and Private Contractors:

- Identification of any vendors used for market comparisons or payment standard setting
  - Instances where market data was used to override or avoid HUD Fair Market Rent thresholds
  - Policies or criteria SHRA follows when using local vs. federal payment metrics
4. Reasonable Accommodation Process and Outcomes:
- Workflow from receipt to resolution of RA requests
  - Role of individual SHRA employees vs. committee review
  - Number of accommodations granted/denied by disability category
  - Criteria used to deny RA requests, including 'nexus' requirements
5. COVID-Era Lobby and Service Closures:
- Timeline for reopening physical lobby services
  - Internal discussions or decisions that extended closure beyond county/federal guidance
  - Use of CARES Act or other COVID-related funding during this period
6. Phone System Logs and Communication Access:
- Voicemail configurations and staffing for the RA phone line
  - Any logs, reports, or audits of call volume or wait times
  - Identity of staff responsible for voicemail content and configuration (especially before Sept. 2022)
7. Internal Training & Policy Updates:
- Staff training on ADA, FHA, Section 504 compliance
  - Frequency and content of such trainings
8. Data Collection and Retention Practices:
- Systems used to track RA requests, voucher movement, denials, or overrides
  - Reports or audits conducted internally or by HUD related to these areas

Please respond within 10 days identifying the appropriate designee(s) for each topic and their availability for deposition. If you contend that no witness can testify to a particular topic, please state so expressly and explain the basis for such a position.

Sincerely,

David Samuel  
Sydney Roberts

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CASE NUMBER

2:22-cv-01699-DJC AC

PLAINTIFF(S),

v.

DEFENDANT(S).

**PROOF OF SERVICE - ACKNOWLEDGMENT  
OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of \_\_\_\_\_, State of California, and not a party to the above-entitled cause. On \_\_\_\_\_, 20\_\_\_\_\_, I served a true copy of

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following: (list names and addresses for person(s) served. Attach additional pages if necessary.)

Place of Mailing: \_\_\_\_\_

Executed on \_\_\_\_\_, 20\_\_\_\_\_ at \_\_\_\_\_, California

Please check one of these boxes if service is made by mail:

- ☐ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.
- ☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
- ☐ I hereby certify under the penalty of perjury that the foregoing is true and correct.

Barbara McGarvey  
*Signature of Person Making Service*

**ACKNOWLEDGEMENT OF SERVICE**

I, \_\_\_\_\_, received a true copy of the within document on \_\_\_\_\_.

\_\_\_\_\_  
*Signature*\_\_\_\_\_  
*Party Served*

David Samuel  
Sydney Roberts  
Plaintiffs, Pro Se  
108 Rinetti Way  
Rio Linda, CA 95673  
Email: [edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)  
Phone: 512-522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.,

Plaintiffs,

v.

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.,

Defendants.

---

Case No. 2:22-cv-01699 DJC AC

## PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS

### TO DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that Defendant Sacramento Housing and Redevelopment Agency ("SHRA") produce the documents and materials described below within thirty (30) days of service hereof. This request is continuing in nature, and Defendant must supplement its responses as required by Rule 26(e).

Plaintiffs note Defendants' April 10, 2025 letter indicating that they do not intend to respond to discovery until after resolution of the pending Motion for Summary Judgment. Plaintiffs respectfully disagree. Unless a formal stay has been granted by the Court, all parties remain obligated to participate in discovery under Rule 26, and unilateral refusal to respond is improper.

### DEFINITIONS AND INSTRUCTIONS

1. The term "SHRA" refers to the Sacramento Housing and Redevelopment Agency and all of its departments, subdivisions, employees, agents, contractors, and representatives.

2. The term "Plaintiffs" refers to Sydney Roberts and David Samuel.
3. The term "document" includes all written, recorded, or electronic communications, including but not limited to emails, memos, letters, handwritten notes, internal reports, audio recordings, digital files, or attachments.
4. If any document responsive to this request is withheld on the basis of privilege, state the nature of the document, the date, author, recipient, and the basis for the claimed privilege.
5. These requests are continuing in nature, and Defendant must provide supplemental responses under Rule 26(e) if additional responsive documents become known or available.

#### REQUESTS FOR PRODUCTION

RFP 1: All documents, meeting agendas, meeting notes, minutes, summaries, memoranda, or action item lists created or maintained by SHRA reflecting or referring to meetings between SHRA staff and representatives of Consumers Self Help Center, Sustainable Wellness Solutions, or peer advocate organizations from January 1, 2023 through May 31, 2024.

RFP 2: All attendance sheets, sign-in logs, scheduling notices, or internal communications identifying participants, locations, or purposes of meetings held between SHRA staff and representatives of Consumers Self Help Center, Sustainable Wellness Solutions, or peer advocate organizations between January 1, 2023 and May 31, 2024.

RFP 3: All internal emails, memoranda, or reports summarizing issues discussed, outcomes, or follow-up actions from meetings held between SHRA staff and representatives of Consumers Self Help Center, Sustainable Wellness Solutions, or peer advocate organizations from January 1, 2023 through May 31, 2024.

RFP 4: All documents identifying the SHRA staff members responsible for attending, coordinating, or reporting on meetings involving Consumers Self Help Center, Sustainable Wellness Solutions, or peer advocate organizations between January 1, 2023 and May 31, 2024.

Dated: April 25, 2025

David Samuel  
Sydney Roberts  
Plaintiffs, Pro Se  
108 Rinetti Way  
Rio Linda, CA 95673  
[edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)  
(512) 522-8571



NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CASE NUMBER

2:22-cv-01699-DJC AC

PLAINTIFF(S),

v.

DEFENDANT(S).

**PROOF OF SERVICE - ACKNOWLEDGMENT  
OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of \_\_\_\_\_, State of California, and not a party to the above-entitled cause. On \_\_\_\_\_, 20\_\_\_\_\_, I served a true copy of

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following: (list names and addresses for person(s) served. Attach additional pages if necessary.)

Place of Mailing: \_\_\_\_\_

Executed on \_\_\_\_\_, 20\_\_\_\_\_ at \_\_\_\_\_, California

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- ☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
- ☐ I hereby certify under the penalty of perjury that the foregoing is true and correct.

*Barbara McGarvey*

*Signature of Person Making Service*

**ACKNOWLEDGEMENT OF SERVICE**

I, \_\_\_\_\_, received a true copy of the within document on \_\_\_\_\_.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Party Served*

David Samuel  
Sydney Roberts  
Plaintiffs, Pro Se  
108 Rinetti Way  
Rio Linda, CA 95673  
Email: [edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)  
Phone: 512-522-8571

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY ROBERTS, et al.,

Plaintiffs,

v.

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, et al.,

Defendants.

---

Case No. 2:22-cv-01699 DJC AC

PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS  
TO DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that Defendant Sacramento Housing and Redevelopment Agency ("SHRA") produce the documents and materials described below within thirty (30) days of service hereof. This request is continuing in nature, and Defendant must supplement its responses as required by Rule 26(e).

Plaintiffs note Defendants' April 10, 2025 letter indicating that they do not intend to respond to discovery until after resolution of the pending Motion for Summary Judgment. Plaintiffs respectfully disagree. Unless a formal stay has been granted by the Court, all parties remain obligated to participate in discovery under Rule 26, and unilateral refusal to respond is improper.

DEFINITIONS AND INSTRUCTIONS

1. The term “SHRA” refers to the Sacramento Housing and Redevelopment Agency and all of its departments, subdivisions, employees, agents, contractors, and representatives.
2. The term “Plaintiffs” refers to Sydney Roberts and David Samuel.
3. The term “document” includes all written, recorded, or electronic communications, including but not limited to emails, memos, letters, handwritten notes, internal reports, audio recordings, digital files, or attachments.
4. If any document responsive to this request is withheld on the basis of privilege, state the nature of the document, the date, author, recipient, and the basis for the claimed privilege.
5. These requests are continuing in nature, and Defendant must provide supplemental responses under Rule 26(e) if additional responsive documents become known or available.

#### REQUESTS FOR PRODUCTION

RFP 1: All communications, emails, notes, or documents between SHRA staff and Sacramento Self Help Housing (SSHH) or its employees, including Ashley Valentine, from January 1, 2022 through December 31, 2024.

RFP 2: All contracts, memoranda of understanding (MOUs), funding agreements, or partnership documents between SHRA and Sacramento County relating to the Flexible Supportive Rehousing Program (FSRP), Permanent Rehousing Transition Services (PRTS), or any related supportive housing programs from 2016 to the present.

RFP 3: All internal communications, meeting notes, or memoranda discussing Sacramento Self Help Housing's role in housing navigation, voucher processing, reasonable accommodation support, or case management services.

RFP 4: All documents discussing the shutdown, transition, reallocation of clients, or service discontinuation related to Sacramento Self Help Housing from January 1, 2016 through December 31, 2024.

RFP 5: All communications, emails, reports, meeting notes, or memoranda involving SHRA staff that reference the Permanent Rehousing Transition Services (PRTS) program, including any interagency coordination meetings with Sacramento County or County-affiliated behavioral health providers.

RFP 6: All internal SHRA documents or communications identifying SHRA's role or obligations in relation to the FSRP or PRTS programs, including references to voucher approvals, participant referrals, or service integration.

Dated: April 25, 2025

David Samuel  
Sydney Roberts  
Plaintiffs, Pro Se  
108 Rinetti Way  
Rio Linda, CA 95673  
[edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)  
(512) 522-8571

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CASE NUMBER

2:22-cv-01699-DJC AC

PLAINTIFF(S),

v.

DEFENDANT(S).

**PROOF OF SERVICE - ACKNOWLEDGMENT  
OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of \_\_\_\_\_, State of California, and not a party to the above-entitled cause. On \_\_\_\_\_, 20\_\_\_\_\_, I served a true copy of

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following: (list names and addresses for person(s) served. Attach additional pages if necessary.)

Place of Mailing: \_\_\_\_\_

Executed on \_\_\_\_\_, 20\_\_\_\_\_ at \_\_\_\_\_, California

Please check one of these boxes if service is made by mail:

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- ☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
- ☐ I hereby certify under the penalty of perjury that the foregoing is true and correct.

Barbara McGarvey

*Signature of Person Making Service*

**ACKNOWLEDGEMENT OF SERVICE**

I, \_\_\_\_\_, received a true copy of the within document on \_\_\_\_\_.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Party Served*



David Samuel &lt;davidsa@possiblymaybe.com&gt;

---

**Upcoming Deadlines for Plaintiffs' Discovery Requests – Case No. 2:22-cv-01699  
DJC AC**3 messages

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**David Samuel** <davidsa@possiblymaybe.com>

Mon, May 5, 2025 at 8:00 AM

To: "Garson, Edward" <edward.garson@wilsonelser.com>, "Castillo, Monica" <monica.castillo@wilsonelser.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

May 5, 2025

VIA EMAIL ONLY

Edward P. Garson (SBN 96786)  
Monica Castillo (SBN 146154)  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery Street, Suite 900  
San Francisco, CA 94111

**Re:** Samuel & Roberts v. SHRA – Discovery Deadlines

Dear Mr. Garson and Ms. Castillo,

This is a friendly reminder that responses to Plaintiffs' discovery requests are due imminently:

- Plaintiffs' First Request for Production to SHRA, served April 3, 2025 (due May 3, 2025)
- Plaintiffs' DOE-Identification Request, served April 8, 2025 (due May 8, 2025)
- Plaintiffs' First Set of Requests for Production, Interrogatories and RFAs to individual SHRA employees, served April 12, 2025 (due May 12, 2025)

To date, we have not received any substantive responses or objections to these three discovery sets. As no discovery stay is in effect – and a pending motion for summary judgment does not excuse compliance with your Rule 26 and Rule 34 obligations – we expect full, timely production of all non-privileged documents and answers by the deadlines listed above.

If we do not receive complete responses by those dates, we will have no choice but to file appropriate motions to compel under Rule 37, and to seek costs and sanctions.

Please let us know promptly if you anticipate any scheduling conflicts or require a narrowly tailored extension. Otherwise, we look forward to your compliance.

Very truly yours,

David Samuel

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Mon, May 5, 2025 at 8:27 AM

To: David Samuel <davidsa@possiblymaybe.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>

Mr. Samuel:

The response to your Special Interrogatories was due on Saturday, May 3, 2025. Pursuant to FRCP R. 6(a)91)(C), the due date continues to run until the end of today, Monday, May 5, 2025.

Since you have brought up discovery responses, we remind you that Requests for Production of Documents were served to you and Ms. Roberts on **August 6, 2024**, and remain unanswered.

Pleaser serve verified responses and produce responses documents by May 12, 2025, or we will move to compel responses and production.

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>

**Sent:** Monday, May 5, 2025 8:00 AM

**To:** Garson, Edward <[Edward.Garson@wilsonelser.com](mailto:Edward.Garson@wilsonelser.com)>; Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>; Maddy, David and Artemis Samuel <[home@possiblymaybe.com](mailto:home@possiblymaybe.com)>; Barbara McGarvey <[sea@possiblymaybe.com](mailto:sea@possiblymaybe.com)>

**Subject:** Upcoming Deadlines for Plaintiffs' Discovery Requests – Case No. 2:22-cv-01699 DJC AC

**EXTERNAL EMAIL** This email originated from outside the organization.

[Quoted text hidden]

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Thank you.

---

David Samuel <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Mon, May 5, 2025 at 8:55 AM

Counsel:

This letter responds to your May 5 2025 email requesting an update on Plaintiffs' production of documents responsive to Defendants' August 6 2024 Requests for Production ("RFPs").

**1. Prior production satisfies the outstanding RFPs**

On May 6 2024 Plaintiffs served their Rule 26(a)(1) Initial Disclosure package on Associate Alexander Cheung. That email included:

- Labeled.zip – native-format exhibits
- Initial Disclosure and Potential Witness List (PDF)
- Initial Settlement Terms (PDF)
- Disclosed Evidence List (PDF and XLSX)

Those materials encompassed every document in Plaintiffs' possession that was responsive to RFP Nos. 1–18 as of that date.

**2. No additional responsive documents existed when the RFPs were served**

Because no further responsive material was in Plaintiffs' possession on August 6 2024, there was nothing more to produce. Plaintiffs therefore complied fully with Rules 26 and 34.

**3. Supplemental disclosure timetable**

Plaintiffs continue to gather newly located records, including recent Greystar correspondence and an updated harms tracker. A Second Supplemental Disclosure will be served on or before **June 1 2025** in native format with metadata intact, subject to an appropriate protective order for any sensitive medical or financial materials.

**4. Protective order**

Plaintiffs again request execution of a narrowly tailored protective order to govern confidential materials. If Defendants prefer alternative language, please circulate a proposed draft so that the parties can submit a joint stipulation to the Court.

Nothing in this correspondence waives any objections, privileges, or rights to seek relief under Rule 37 should disputes arise concerning future productions.

[Quoted text hidden]





David Samuel <davidsa@possiblymaybe.com>

---

## Roberts v. SHRA; our file 21727.00057

3 messages

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Mon, May 5, 2025 at 9:42 AM

To: "davidsa@possiblymaybe.com" <davidsa@possiblymaybe.com>, "home@possiblymaybe.com"

<home@possiblymaybe.com>, "sea@possiblymaybe.com" <sea@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>

Mr. Roberts and Ms. Samuel:

As you know, our responses to your First Request for Production are due today.

We are requesting a one-week extension, for responses to be due by May 12, 2025.

Please advise if you are amenable to the extension.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

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Thank you.

---

**David Samuel** <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Mon, May 5, 2025 at 10:42 AM

Counsel:

We are amenable to a one-week extension for Defendants' responses to the First Request for Production, with responses due by **May 12, 2025**, subject to the following conditions:

1. Plaintiffs do not waive any objections regarding the substance, completeness, or timing of Defendants' responses, including the right to move to compel if responses are inadequate or incomplete.
2. Plaintiffs expressly preserve all rights under Rule 37 given Defendants' letter stating an intent to withhold discovery until after resolution of the summary judgment motion. To date, Defendants have produced no discovery of any kind.
3. Plaintiffs agree to this extension in good faith, but we are concerned about ongoing delay. We request that Defendants confirm they will not oppose a proportional extension to the discovery cutoff, should one be needed as a result of this or similar delays.

Please confirm that this understanding is acceptable.

David

[Quoted text hidden]

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>  
To: David Samuel <davidsa@possiblymaybe.com>  
Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Mon, May 5, 2025 at 10:56 AM

Mr. Samuel:

Thank you for agreeing to the extension. We will agree to a one-week extension of time for Plaintiffs to file a motion re my clients' pending responses to Plaintiffs' First Request for Production, if needed.

To clarify – we did not state we would withhold discovery until after resolution of the summary judgment motion. To date, the only discovery that is currently due as of today is the one which you have agreed to the extension.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>  
**Sent:** Monday, May 5, 2025 10:42 AM  
**To:** Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>  
**Subject:** Re: Roberts v. SHRA; our file 21727.00057

**EXTERNAL EMAIL** This email originated from outside the organization.

[Quoted text hidden]

[Quoted text hidden]



David Samuel <davidsa@possiblymaybe.com>

---

**RE: Roberts v. SHRA; our file 21727.00057; extension for all discovery responses**

5 messages

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**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Wed, May 7, 2025 at 12:15 PM

To: David Samuel <davidsa@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Mr. Samuel:

In order to respond to all the discovery you have propounded to date, it is necessary to speak with many people, including some who are no longer with SHRA and difficult to locate.

Thus, we would like an extension for all discovery responses, to be due on May 30, 2025.

Please advise if agreeable.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>

**Sent:** Monday, May 5, 2025 10:42 AM

**To:** Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>

**Subject:** Re: Roberts v. SHRA; our file 21727.00057

**EXTERNAL EMAIL** This email originated from outside the organization.

Counsel:

We are amenable to a one-week extension for Defendants' responses to the First Request for Production, with responses due by **May 12, 2025**, subject to the following conditions:

1. Plaintiffs do not waive any objections regarding the substance, completeness, or timing of Defendants' responses, including the right to move to compel if responses are inadequate or incomplete.
2. Plaintiffs expressly preserve all rights under Rule 37 given Defendants' letter stating an intent to withhold discovery until after resolution of the summary judgment motion. To date, Defendants have produced no discovery of any kind.
3. Plaintiffs agree to this extension in good faith, but we are concerned about ongoing delay. We request that Defendants confirm they will not oppose a proportional extension to the discovery cutoff, should one be needed as a result of this or similar delays.

Please confirm that this understanding is acceptable.

David

On Mon, May 5, 2025 at 9:42 AM Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)> wrote:

Mr. Roberts and Ms. Samuel:

As you know, our responses to your First Request for Production are due today.

We are requesting a one-week extension, for responses to be due by May 12, 2025.

Please advise if you are amenable to the extension.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

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Thank you.

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Thank you.

---

David Samuel <davidsa@possiblymaybe.com>  
To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

Wed, May 7, 2025 at 1:12 PM

Counsel:

We acknowledge your May 7 request for an extension to May 30, 2025, to respond to Plaintiffs' outstanding discovery. Plaintiffs are willing to consider a reasonable extension **provided** that the following conditions are met:

1. **Reciprocal Extension and Stipulated Discovery Deadline Adjustment:** Defendants must stipulate to extend the overall discovery period by 23 days (matching the requested delay), and expressly agree to waive any objection to this adjustment.
2. **No Stay or Deferral Asserted:** Defendants must confirm in writing that they are not asserting, and will not assert, any stay or limitation on discovery obligations—including depositions—based on pending motions (e.g., summary judgment or Rule 60(b)).
3. **No Waiver of Plaintiff Rights:** Plaintiffs reserve all rights to serve supplemental discovery in response to late disclosures, and Defendants shall waive objections based on timing if such responses are necessitated by delayed production.
4. **Rolling Production Deadline:** Defendants must begin rolling production of all documents currently in their possession or control **no later than May 14, 2025**. This includes all records not contingent on witness availability.

We understand that logistical challenges can arise in contacting former SHRA employees. However, that consideration does not extend to materials maintained in the regular course of business, records mandated by federal regulation, or responses from current SHRA personnel. Those materials and individuals should be immediately accessible, and no further delay is justified.

To the extent your extension request is based on difficulty locating former employees, Plaintiffs request immediate clarification of which SHRA personnel are currently available. Specifically, we request confirmation as to whether **MaryLiz Paulson** remains employed. Ms. Paulson is the signatory to all of the reasonable accommodation denial letters at issue. If she remains employed, full responses to discovery directed to Ms. Paulson must be produced immediately. Her role is central to SHRA's internal decision-making, and both her testimony and documentation are essential to Plaintiffs' core claims.

In addition, Plaintiffs request immediate production of the following categories of non-contingent records:

- All **readily accessible electronic records**, including internal emails, database logs, voucher processing entries, and metadata for denial letters (e.g., the April 3, 2023 letter referenced in Exhibit 1);
- The **complete administrative record** related to Plaintiffs' voucher and reasonable accommodation requests;
- **HUD-mandated documents**, including but not limited to:
  - HUD Form 50058s and certification materials;

- HAP payment logs and disbursement records;
- Annual recertification documentation;
- All materials required to be retained under **24 C.F.R. § 982.158**;
- Documentation regarding the **Reasonable Accommodation Compliance Committee (RACC)**, including:
  - Member rosters;
  - Meeting minutes;
  - Voting records;
  - Internal guidance or procedural documents;
- A copy of SHRA's **current organizational chart** indicating who currently occupies roles relevant to Plaintiffs' discovery;
- A **witness availability calendar** listing dates within the next 30–45 days for depositions of SHRA staff.

If Defendants claim that any necessary personnel are unavailable, Plaintiffs request that SHRA immediately designate appropriate **corporate representatives under Federal Rule of Civil Procedure 30(b)(6)** to testify regarding:

- SHRA's reasonable accommodation policies and practices;
- Failures related to hearing scheduling and completion (e.g., April 20 and June 2, 2023);
- SHRA's knowledge of Plaintiffs' relocation to 1100 Howe and continued HAP payments to the Empress Street landlord.

These materials and witnesses are directly relevant to Plaintiffs' pending Rule 60(b) motion (Dkt. 101) and to claims that the reasonable accommodation process employed by SHRA was pretextual and in violation of both federal regulations and HUD standards.

If Defendants fail to comply with the rolling production deadline or any of the conditions above, Plaintiffs will seek appropriate relief under **Federal Rule of Civil Procedure 37**, including attorney's fees and, if warranted, an adverse inference instruction regarding spoliation or concealment of material evidence.

Please confirm whether Defendants agree to the terms outlined above, and whether rolling production will begin immediately.

David

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>

Wed, May 7, 2025 at 1:14 PM

To: "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

[Quoted text hidden]

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Wed, May 7, 2025 at 3:20 PM

To: David Samuel <davidsa@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Mr. Samuel,



Thank you for your prompt response. We want to assure you that we are working diligently with SHRA to provide information responsive to the 25 sets of discovery you have served on Defendants. However, it is taking us a great deal of time to work through these due to the number of requests and level of detail you are asking us of us. Additionally, SHRA is a government entity with its own processes for handling such requests, in addition to operating only four days a week, which puts further constraints on our ability to provide these responses to you by the date you are requesting. We are working as quickly as is feasible to provide you with the information you are seeking. We make this request for an extension because we want to participate in this discovery process in good faith and hope that you will similarly, in good faith, grant an extension.

Regarding your conditions outlined in your below email, we respond as follows:

1. We can agree to extend the current discovery cutoff by 30 days to account for the extension we have asked for (i.e., Defendants responses to all Plaintiff's requests due on 5/30/25).
2. We are not asserting, and will not assert, a stay or other limitations on discovery obligations based on any currently pending motions.
3. Regarding your request regarding your right to serve supplemental discovery, we don't entirely understand what you are proposing. To the extent that you require additional time to serve supplemental discovery, please see item 1 where we propose an extension to the discovery cutoff. This should allow you the additional time you are seeking.
4. We cannot agree to a rolling production deadline of 5/14/25 and have explained the reasons we are seeking this extension above. We can informally agree to provide you with the discovery responses as we complete them, but anticipate we will have them ready by 5/30/25 – hence the need for the extension.

You have made an additional demand for documents in your email, which is not appropriate for the subject of this meet and confer regarding the requests that were already served. If you were to serve these per code today, we would have 30 days to respond and our responses would be due on 6/6/25. While these documents were not included in any of your requests for production of documents served on Defendants, if you are willing to grant the extension of all discovery responses to 5/30/25, we will treat this as Plaintiff's Requests for Production of Documents to SHRA, Set Three and will provide responses by 5/30/25. We are hopeful this will continue to demonstrate our good faith efforts to provide the information you are seeking.

Regarding your demand to designate "corporate representatives . . . to testify"-- this is not an appropriate condition of the current meet and confer regarding responses to discovery requests. Should you wish to depose a representative of SHRA, please do so using the appropriate procedure.

**Please advise if you agree to extend the deadline for all discovery responses to 5/30/25. We will in turn treat the additional requests you have included in your email as your third set of requests for production of documents and unilaterally shorten the deadline for those responses to 5/30/25. Additionally, we will agree to extend the discovery cutoff by 30 days.**

We are hopeful that we will be able to resolve this to allow us to provide as complete responses as possible to your discovery requests. We are willing to extend the same courtesy to you, should you have a reciprocal meet and confer request.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>  
**Sent:** Wednesday, May 7, 2025 1:13 PM  
**To:** Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>  
**Subject:** Re: Roberts v. SHRA; our file 21727.00057; extension for all discovery responses

**EXTERNAL EMAIL** This email originated from outside the organization.

[Quoted text hidden]

[Quoted text hidden]

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**David Samuel** <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)> Wed, May 7, 2025 at 4:12 PM  
To: "Castillo, Monica" <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>, "Maddy, David and Artemis Samuel" <[home@possiblymaybe.com](mailto:home@possiblymaybe.com)>, Barbara McGarvey <[sea@possiblymaybe.com](mailto:sea@possiblymaybe.com)>

Counsel,

I understand the logistical difficulty of working with SHRA, it's a challenge we've faced for years. That said, Defendants have a pending summary judgment motion and we are being forced to defend it while key discovery remains unproduced.

We expect full compliance with the Federal Rules of Civil Procedure and with SHRA's obligations under HUD regulations, including timely production of administrative records, payment logs, and communications that are required to be retained under 24 C.F.R. § 982.158. If these materials are not produced promptly, we will seek appropriate relief under Rule 37.

Best,  
David

[Quoted text hidden]



David Samuel <davidsa@possiblymaybe.com>

---

## Roberts v. SHRA. Discovery.

5 messages

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**Touson, Geraldine** <Geraldine.Touson@wilsonelser.com>

Thu, May 8, 2025 at 3:50 PM

To: "home@possiblymaybe.com" <home@possiblymaybe.com>, "davidsa@possiblymaybe.com" <davidsa@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Dear Counsel,

Please see attached:

DEFENDANT' SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S

RESPONSE TO PLAINTIFFS' REVEAL DOES DEMAND (i.e., INTERROGATORIES, SET ONE)

Thank you,

Geraldine Touson  
Legal Administrative Assistant  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9367 (Direct)  
415.433.0990 (Main)  
415.434.1370 (Fax)  
[geraldine.touson@wilsonelser.com](mailto:geraldine.touson@wilsonelser.com)

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received this communication in error, please notify us immediately by return e-mail and delete the original message and any copies of it from your computer system.

For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at [www.wilsonelser.com](http://www.wilsonelser.com) or refer to any of our offices.

Thank you.



**2025.05.08 Def. Response to Plf. Interrogatories to SHRA..pdf**

1148K

**David Samuel** <davidsa@possiblymaybe.com>

Thu, May 8, 2025 at 5:51 PM

To: "Touson, Geraldine" <Geraldine.Touson@wilsonelser.com>

Cc: "home@possiblymaybe.com" <home@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Counsel:

In the interest of judicial economy and avoiding the burden of scheduling potentially numerous depositions for each individual listed in Exhibit A of your May 8, 2025, responses, we request clarification and supplemental responses regarding the following deficiencies within **three (3) business days**:

**RACC Membership (Interrogatory No. 1):** Your response references a general rotation schedule but fails to identify which specific members actually reviewed and decided Plaintiffs' reasonable accommodation requests resulting in the denial letters dated July 08, 2022, November 16, 2022, March 20, 2023, April 03, 2023, June 28, 2023, and all other denials not specifically noted.

Please supplement your response to identify: Which specific RACC members participated in the decisions regarding Plaintiffs' requests on the relevant dates. Identify where this information is documented (e.g., meeting minutes, case files). If SHRA asserts it lacks records identifying the specific decision-makers for these requests, please explain how this comports with SHRA's record-keeping obligations under applicable HUD guidance (e.g., PIH Notice 2013-19, Sec. 2.F; 24 C.F.R. § 982.158), and 24 C.F.R. § 982.555(e)(6)'s requirement to maintain hearing records.

**Housing Inspectors (Interrogatory No. 3):** Your response states SHRA contracts with Nan McKay and "does not personally keep a log" of inspectors.

Please supplement your response: Does SHRA contend it has no obligation under HUD regulations to track inspectors? Given SHRA's oversight responsibilities, please produce the inspection logs relevant to all HQS inspections conducted by Nan McKay during the relevant period, or confirm you have requested these specific records from the contractor for production.

**Rent Reasonableness Tools (Interrogatory No. 2):** Your response lists third-party vendors but does not specify which tools were used to evaluate Plaintiffs' voucher subsidy limits or rent reasonableness.

Please supplement your response to identify: Please identify which specific tool(s) (e.g., Yardi, Nelrod, AffordableHousing.com) were used to determine Plaintiffs' subsidy limits between 2022 and 2024, and produce any reconciliation reports explaining discrepancies between SAFMR rates and SHRA's determinations.

If we do not receive complete and responsive answers addressing these specific deficiencies by **May 14, 2025**, we will have no alternative but to proceed with filing our Motion to Compel and may be required to: Notice depositions of RACC members listed generally in your Exhibit A to determine who participated in the relevant decisions; Subpoena Nan McKay for the relevant inspector records; and Seek recovery of the reasonable expenses incurred in making the motion, including costs associated with this avoidable discovery burden, pursuant to Rule 37(a)(5).

We are available to discuss these requests by email before May 14 if you require clarification.

Best regards,

David

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com>

Thu, May 8, 2025 at 7:01 PM

To: "Touson, Geraldine" <Geraldine.Touson@wilsonelser.com>

Cc: "home@possiblymaybe.com" <home@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Counsel:

Per FRCP 26(b)(5)(A) and 34(b)(2)(C), Defendants must produce a privilege log for any documents withheld under a claim of privilege or work-product protection. To date, Defendants have not provided such a log despite asserting privilege in their May 08, 2025 responses.

Please produce a compliant log within **5 business days** (by **May 15, 2025**) that identifies:

1. **Each document's date, author, recipients, and subject matter;**
2. **The specific privilege claimed** (e.g., attorney-client, work product);
3. **A factual basis for the privilege** (e.g., "Email seeking legal advice from SHRA counsel").

Failure to provide this log will result in Plaintiffs seeking waiver of all privilege claims under *FRCP 37(b)(2)* and *In re Roman Catholic Archbishop*, 661 F.3d 417 (9th Cir. 2011).

We hope to resolve this without court intervention.

Best regards,

David

[Quoted text hidden]

**David Samuel** <davidsa@possiblymaybe.com>

Thu, May 8, 2025 at 8:39 PM

To: "Touson, Geraldine" <Geraldine.Touson@wilsonelser.com>

Cc: "home@possiblymaybe.com" <home@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Counsel:

We write regarding SHRA's May 8, 2025 discovery responses, which raise significant concerns about compliance with federal recordkeeping requirements. Specifically:

- RACC Decisions: SHRA failed to identify which RACC members reviewed Plaintiffs' accommodation requests (despite producing a rotation schedule);
- HQS Inspections: SHRA claims it "does not personally keep a log" of inspectors, shifting responsibility to Nan McKay;
- Rent Reasonableness: SHRA provided vendor names but no documentation of how Plaintiffs' subsidy limits were determined.

As you know, 24 C.F.R. § 982.158 and HUD PIH Notice 2013-19 require SHRA to maintain records of accommodation decisions, inspections, and rent analyses for at least 3 years. SHRA cannot delegate its recordkeeping obligations to third parties for core PHA functions.

Given these deficiencies, please confirm in writing by May 14, 2025 whether:

- RACC Records: SHRA ever documented which members voted on Plaintiffs' requests (July 2022–June 2023), including meeting minutes, case notes, or emails;

- Inspector Logs: SHRA requested and preserved Nan McKay's HQS inspection reports for Plaintiffs' unit ([address]);
- Rent Analyses: SHRA retains the specific software outputs or reports used to set Plaintiffs' subsidy limits in 2022–2023.

If no such records exist, please explain:

- How SHRA complied with 24 C.F.R. § 982.555(e)(6) (documenting hearing decisions) and § 982.404(a) (maintaining inspection records);
- Whether any records were lost or destroyed, and if so, when and why.

We hope to resolve this cooperatively but must preserve all rights under Rule 37(e) and spoliation doctrine. See, e.g., *Silvestri v. Gen. Motors*, 271 F.3d 583 (4th Cir. 2001) (adverse inference for lost evidence).

Best Regards,  
David

[Quoted text hidden]

---

**David Samuel** <davidsa@possiblymaybe.com>

Fri, May 9, 2025 at 9:34 AM

To: "Touson, Geraldine" <Geraldine.Touson@wilsonelser.com>

Cc: "home@possiblymaybe.com" <home@possiblymaybe.com>, "maddy@possiblymaybe.com" <maddy@possiblymaybe.com>, "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Counsel:

We are writing to provide a minor correction to our previous email dated May 8, 2025 and to further clarify our concerns regarding SHRA's discovery responses, particularly concerning HQS inspections and rent reasonableness determinations.

Correction:

In Point 2 of our prior email regarding Housing Inspectors (Interrogatory No. 3), the placeholder "[address]" was inadvertently left in. To clarify, our concern regarding inspection logs and SHRA's practices is not limited to a single unit. We are seeking information to understand SHRA's general practices regarding HQS inspections, particularly when reasonable accommodations for unit features or location are implicated by a tenant's disability needs.

Further Clarification on HQS Inspections & Rent Reasonableness (Interrogatories No. 2 & 3):

Our core concern, and the aim of our discovery requests, is to understand whether SHRA conducts necessary HQS inspections and performs bona fide rent reasonableness analyses before denying RFTAs, especially when those RFTAs involve requested or previously approved reasonable accommodations.

We have reason to believe, based on multiple RFTA denials (including, for example, the RFTA for 7957 Papago Way, where the landlord provided market analysis as part of the RFTA package), that SHRA may be denying units based on rent reasonableness without first conducting a required HQS inspection or a thorough, documented rent reasonableness analysis that considers all relevant factors, including any disability-related features that might justify a particular rent or make a unit uniquely suitable.

The failure to conduct timely HQS inspections and appropriate rent reasonableness determinations, particularly when processing RFTAs for families with disabilities requiring specific unit features or locations (which may necessitate a reasonable accommodation for payment standards), potentially violates obligations under 24 C.F.R. § 982.305 (PHA approval of assisted tenancy), 24 C.F.R. § 982.507 (Rent to owner: Reasonable Rent), and general obligations to affirmatively further fair housing.

Specifically, we require information to determine:

- Whether HQS inspections were performed for RFTAs submitted on our behalf where units were subsequently denied for "rent reasonableness" or other grounds.
- The specific criteria, data sources (beyond general vendor lists), and methodologies SHRA uses to determine "rent reasonableness" for any given unit, and how these are documented.

- How SHRA ensures that its rent reasonableness process and HQS inspection practices accommodate and do not unlawfully impede reasonable accommodation requests for specific unit types, features, or locations necessary due to disability.
- SHRA's policies and actual practices for maintaining records of HQS inspections performed by its contractors (such as Nan McKay) and the specific rent reasonableness analyses conducted for RFTAs.
- If SHRA is denying RFTAs without conducting these crucial predicate steps, or is relying on incomplete or "intentionally incorrect data" as we suspect, it would represent a systemic failure that significantly prejudices families like ours, particularly those requiring reasonable accommodations.

We again request complete and responsive supplemental answers to Interrogatories No. 1, 2, and 3 from your May 8, 2025 responses, clarifying these points, by **May 14, 2025**.

We continue to hope for a cooperative resolution.

Best regards,

David

[Quoted text hidden]

EDWARD P. GARSON (SBN 96786)  
[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
 MONICA C. CASTILLO (SBN 146154)  
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[Chandni.Mistry@WilsonElser.com](mailto:Chandni.Mistry@WilsonElser.com)  
**WILSON ELSEER MOSKOWITZ**  
**EDELMAN & DICKER LLP**  
 655 Montgomery Street, Suite 900  
 San Francisco, CA 94111  
 Telephone: (415) 433-0990  
 Facsimile: (415) 434-1370

Attorneys for Defendants SACRAMENTO  
 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT' SACRAMENTO HOUSING  
 AND REDEVELOPMENT AGENCY'S  
 RESPONSE TO PLAINTIFFS' REVEAL  
 DOES DEMAND (i.e., INTERROGATORIES,  
 SET ONE)**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs SYDNEY BROOK ROBERTS and DAVID TYRONE  
 SAMUEL

RESPONDING PARTY: Defendant SACRAMENTO HOUSING AND REDEVELOPMENT  
 AGENCY

SET NO.: One (1)

//



1 //

2 Defendant SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY (hereinafter  
3 “SHRA”) responds to Plaintiffs SYDNEY BROOK ROBERTS and DAVID TYRONE SAMUEL’s  
4 Reveal DOES Demand (i.e., Interrogatories, Set One), as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discovery additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve  
22 the right to amend, supplement, or otherwise modify these disclosures should different, contrary,  
23 or additional information become available.

## 24                                   **RESPONSES TO INTERROGATORIES**

### 25           **INTERROGATORY NO. 1**

26           The names, job titles, and current positions of all individuals who have served as members  
27 of SHRA's Reasonable Accommodation Compliance Committee (RACC) from 2019 to the  
28 present. This request relates to the identification of DOE defendants involved in the evaluation and

1 decision-making regarding Plaintiff's reasonable accommodation requests.

2 **RESPONSE TO INTERROGATORY NO. 1**

3       Objection, the Interrogatory as phrased is and unduly burdensome and overly broad with  
 4 respect to the time and scope of the information sought. Subject to and without waiving said  
 5 objections, Responding Party responds as follows: This interrogatory would necessitate the  
 6 preparation of a compilation, abstract, audit, or summary from documents. (Federal Rules of Civil  
 7 Procedure, Rule 33(d).) Responding Party exercises the option under Rule 33(d) of the Federal  
 8 Rules of Civil Procedure to produce writings in response to this Interrogatory. Responding Party  
 9 refers Propounding Party to the Reasonable Accommodation Committee Rotation Schedule 2018-  
 10 2025, which is attached as Exhibit A. In addition to the information contained in Exhibit A,  
 11 Responding Party notes that every supervisor in the Housing Choice Voucher and Public Housing  
 12 departments rotate their duties on the Reasonable Accommodation Compliance Committee  
 13 (hereinafter "RACC"). All Supervisors and Program Managers have participated on the RACC,  
 14 either currently or in the past. The RACC currently consists of three members as shown in Exhibit  
 15 A, including the following:

16       MaryLiz Paulson, Director of the Housing Choice Voucher (hereinafter "HCV") Program;  
 17       Sarah O'Daniel, Director;  
 18       Melanie Olson, HCV Program Director;  
 19       Troy Lynch, HCV Program Director;  
 20       Ilya Prozorov, HCV Supervisor;  
 21       Nicole Le, HCV Supervisor;  
 22       Meridian Magana, HCV Supervisor;  
 23       Alena Pavlyuk, HCV Supervisor;  
 24       Jose Romero, HCV Staff Manager;  
 25       Diana Pop, Public Housing Regional Manager;  
 26       Maria Vasquez, Public Housing Regional Manager;  
 27       Robbie Folkes, Public Housing Regional Manager;  
 28       Christen Gore, Public Housing Regional Manager;

1 Jeana Thomas, Public Housing Regional Manager;  
2 Any individual not listed above that appears in Exhibit A has left Sacramento Housing and  
3 Redevelopment Agency.

4 **INTERROGATORY NO. 2**

5 The names and business contact information for all third-party companies, consultants,  
6 contractors, or internal departments that have provided rental market analysis or contributed to  
7 SHRA's rent reasonableness determinations since January 1, 2020. This includes any tools,  
8 reports, or software used to access rent comparability or set subsidy limits.

9 **RESPONSE TO INTERROGATORY NO. 2**

10 Objection, the Interrogatory as phrased is vague, ambiguous, and overbroad with respect to  
11 the time and scope of the information sought, and compound. Responding Party will treat this as  
12 three separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and  
13 identify the separate Interrogatories as Interrogatory 2a, Interrogatory 2b, and Interrogatory 2c for  
14 clarity.

15 **INTERROGATORY NO. 2a**

16 The names and business contact information for all third-party companies, consultants,  
17 contractors, or internal departments that have provided rental market analysis or contributed to  
18 SHRA's rent reasonableness determinations since January 1, 2020.

19 **RESPONSE TO INTERROGATORY NO. 2a**

20 Objection, the Interrogatory as phrased is vague, ambiguous, overbroad with respect to the  
21 time and scope of the information sought. Responding Party further objects to the term "business  
22 contact information" as vague and ambiguous. Subject to and without waiving said objections,  
23 Responding Party responds as follows:

24 The Nelrod Company, 3301 West Freeway, Forth Worth, Texas, 76107, (817)922-9000;  
25 AffordableHousing.com, c/o Affordable Housing Network, LLC, 5000 T Rex Ave, Suite  
26 150, Boca Raton, Florida 33431, (561) 416-5255.

27 **INTERROGATORY NO. 2b**

28 Any tools, reports, or software used to access rent comparability since January 1, 2020.

**RESPONSE TO INTERROGATORY NO. 2 b**

Objection, the Interrogatory as phrased is vague, ambiguous, overbroad with respect to the time and scope of the information sought. Subject to and without waiving said objections, Responding Party responds as follows:

The Nelrod Company, 3301 West Freeway, Forth Worth, Texas, 76107, (817)922-9000; AffordableHousing.com, c/o Affordable Housing Network, LLC, 5000 T Rex Ave, Suite 150, Boca Raton, Florida 33431, (561) 416-5255.

**INTERROGATORY NO. 2c**

Any tools, reports, or software used to set subsidy limits since January 1, 2020.

**RESPONSE TO INTERROGATORY NO. 2c**

Objection, the Interrogatory as phrased is vague, ambiguous, overbroad with respect to the time and scope of the information sought. Responding Party further objects on the grounds that this information is equally available to Propounding Party. Subject to and without waiving said objections, Responding Party responds as follows:

Yardi Systems, 430 S Fairview Avenue, Santa Barbara, CA 93117, (805)699-2040.

**INTERROGATORY NO. 3**

The names, job titles, and employment or contractor status of all housing inspectors who have been employed by or contracted with SHRA from January 1, 2020, to the present. This includes inspectors responsible for Housing Quality Standards (HQS) inspections, special inspections, or any inspections associated with the Housing Choice Voucher program.

**RESPONSE TO INTERROGATORY NO. 3**

Objection, the Interrogatory as phrased is vague, ambiguous, overbroad with respect to the time and scope of the information sought, and compound. Subject to and without waiving said objections, Responding Party responds as follows: Responding Party does not have personal knowledge sufficient to respond fully to this interrogatory as it contracts with Nan McKay and Associates, Inc. to conduct all inspections and does not personally keep a log of housing inspectors employed by Nan McKay and Associates, Inc.. Responding Party is informed and believes Nan McKay and Associates, Inc., 1810 Gillespie Way, Suite 202, El Cajon, CA 92020, may have

information responsive to this interrogatory.

**INTERROGATORY NO. 4**

The names, job titles, and responsibilities of all individuals or departments responsible for developing, updating, or maintaining SHRA's inventory of accessible housing units for individuals with disabilities, including any obligations to track, promote, or coordinate placement in accessible units as outlined in HUD regulations.

**RESPONSE TO INTERROGATORY NO. 4**

Objection, the Interrogatory as phrased is vague, ambiguous, and overbroad and unduly burdensome as it seeks the identification of "all individuals or departments" without any reasonable limits on time. Subject to and without waiving said objections, Responding Party limits the time period to January 1, 2020 to the present and responds as follows: Responding Party utilized Go-Section 8 as a webservice for landlords to post their vacancies and information about the accessibility of units. This data was uploaded and maintained by landlords directly and hosted on Responding Party's website: shra.org. In April 2025, Responding Party converted this system to AffordableHousing.com, c/o Affordable Housing Network, LLC, 5000 T Rex Ave, Suite 150, Boca Raton, Florida 33431, (561) 416-5255.

Dated: May 8, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants  
SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY,  
LA SHELLE DOZIER, MARYLIZ  
PAULSON, TORY LYNCH, TANYA CRUZ,  
TAMEKA JACKSON, LISA MACIAS,  
TIFFANY BROWN, and IBRA HENLY

# EXHIBIT A

Reasonable Accommodation Rotation Schedule

RAC ROTATION	Program Manager/Regional	Supervisor HCV	Portfolio Manager	Regional Manager PH
2020				
January	Tanya Tran	Tanya Cruz	Diana Pop	Kitina Galvan
February	Tanya Tran	Tanya Cruz	Diana Pop	Kitina Galvan
March	Tanya Tran	Kassie Slater	Diana Pop	Robbie Folkes
April	Tanya Tran	Cecilia Gibson	Diana Pop	Robbie Folkes
May	Kassie Slater	Cecilia Gibson	Diana Pop	Robbie Folkes
June	Kassie Slater	Cecilia Gibson	Diana Pop	Robbie Folkes
July	Kassie Slater	James Brock	Diana Pop	Robbie Folkes
August	Kassie Slater(TT in on 8/13/2020)	James Brock	Judy Castillo	Sarah Alegria
September	Tanya Tran	James Brock	Judy Castillo	Sarah Alegria
October	Tanya Tran	James Brock	Judy Castillo	Sherri Spaulding
November	Tanya Tran	James Brock	Patricia Simpson	Sarah Alegria
December	Tanya Tran	James Brock	Patricia Simpson	Sherri Spaulding
2021				
January	Tanya Tran	Christen	Patricia Simpson	Sherri Spaulding
February	Tanya Tran	Christen	Hermy Almonte	Robbie Folkes
March	Cheyenne	Christen	Hermy Almonte	Robbie Folkes
April	Cheyenne	Ellen	Hermy Almonte	Jennifer Carroll
May	Cheyenne	Ellen	Diana Pop	Maria Velazquez
June	Cheyenne	Ellen	Patricia Simpson	Maria Velazquez
July	Cheyenne	Amanda Meyer	Patricia Simpson	Corina Cisneros/VACANT
August	Cheyenne	Amanda Meyer	Judy Castillo	Robbie Folkes
September	Kassie Slater	Amanda Meyer	Judy Castillo	Robbie Folkes
October	Kassie Slater	Troy Lynch	Judy Castillo	Christen Gore
November	Kassie Slater	Troy Lynch	Diana Pop	Christen Gore
December	Kassie Slater	Troy Lynch	Diana Pop	Robbie Folkes
2022				
January	Kassie Slater	Alena	Patricia Simpson	Robbie Folkes
February	Kassie Slater	Alena	Patricia Simpson	Robbie Folkes
March	Tanya Cruz	Alena	Judy Castillo	Tanisha Tucker
April	Tanya Cruz	Alena	Judy Castillo	Tanisha Tucker
May	Tanya Cruz	Theresa Cristabol	Christen H.Gore	Rick Jones
June	Troy Lnych	Theresa Cristabol	Christen H.Gore	Rick Jones

Marc  
Katia  
  
Ellen  
Alena  
Theresa



Reasonable Accommodation Rotation Schedule

July	Troy Lnych	Theresa Cristabol	Patricia Simpson	Nicole Davis
August	Troy Lnych	Ilya	Patricia Simpson	Maria Velazquez
September	Kassie Slater	Ilya	Judy Castillo	Maria Velazquez
October	Kassie Slater	Ilya	Judy Castillo	Robbie Folkes
November	Kassie Slater	Ellen	Diana Pop	Robbie Folkes
December	Tanya Cruz	Ellen	Diana Pop	Robbie Folkes
2023				
January	Tanya Cruz	Ellen	Diana Pop	Tanisha Tucker
February	Tanya Cruz	Meridian	Christen H.Gore	Tanisha Tucker
March	Troy Lnych	Meridian	Christen H.Gore	Tanisha Tucker
April	Troy Lnych	Meridian	Christen H.Gore	Maria Velazquez
May	Troy Lnych	Katia	Diana Pop	Maria Velazquez
June	Kassie Slater	Katia	Diana Pop	Maria Velazquez
July	Kassie Slater	Katia	Diana Pop	Robbie Folkes
August	Kassie Slater	Marc	Christen H.Gore	Robbie Folkes
September	Tanya Cruz	Marc	Christen H.Gore	Robbie Folkes
October	Tanya Cruz	Marc	Christen H.Gore	
November	Tanya Cruz	Myvy	Diana Pop	
December	Troy Lnych	Myvy	Diana Pop	

Ilya  
Amanda  
HI-Sup  
Meridian

2023				
January	Tanya Cruz	Ellen	Diana Pop	Tanisha Tucker
February	Tanya Cruz	Meridian	Christen H.Gore	Tanisha Tucker
March	Troy Lynch	Meridian	Christen H.Gore	Tanisha Tucker
April	Troy Lynch	Myvy	Christen H.Gore	Maria Velazquez
May	Troy Lynch	Myvy	Diana Pop	Maria Velazquez
June	Tanya Cruz	Myvy	Diana Pop	Maria Velazquez
July	Tanya Cruz	Ilya	Diana Pop	Robbie Folkes
August	Tanya Cruz	Ilya	Christen H.Gore	Robbie Folkes
September	Melanie Olson	Ilya	Christen H.Gore	Robbie Folkes
October	Melanie Olson	Natalie	Christen H.Gore	Jolanda William
November	Melanie Olson	Natalie	Diana Pop	Jolanda William
December	Troy Lynch	Natalie	Diana Pop	Jolanda William

Reasonable Accommodation Rotation Schedule

2024				
	Program Managers	Supervisors	Portfolio Manager	Regional Manager PH
January	Troy Lynch	Alena	Diana Pop	Maria Velazquez
February	Troy Lynch	Alena	Christen H. Gore	Maria Velazquez
March	Melanie Olson	Alena	Christen H. Gore	Maria Velazquez
April	Melanie Olson	Tyson	Christen H. Gore	Robbie Folkes
May	Melanie Olson	Tyson	Diana Pop	Robbie Folkes
June	Troy Lynch	Tyson	Diana Pop	Robbie Folkes
July	Troy Lynch (MO covering)	Tanya C	Diana Pop	Jeana Thomas
August	Troy Lynch (MO covering)	Tanya C	Christen H. Gore	Jeana Thomas
September	Melanie Olson	Tanya C	Christen H. Gore	Jeana Thomas
October	Melanie Olson	Ilya	Christen H. Gore	Maria Velazquez
November	Melanie Olson	Ilya	Diana Pop	Maria Velazquez
December	Troy Lynch (MO covering)	Ilya	Diana Pop	Maria Velazquez

2025				
	Program Managers	Supervisors	x	Regional Manager PH
January	Troy Lynch (MO covering)	Natalie		Diana Pop
February	Troy Lynch (MO covering)	Natalie		Robbie Folkes
March	Melanie Olson	Ilya Prozorov		Robbie Folkes
April	Melanie Olson	Ilya Prozorov - Jose Romero and Nicole Le in training		Jeana Thomas
May	Melanie Olson	Jose Romero		Jeana Thomas
June	Troy Lynch/Melanie Olson	Jose Romero		Christen Gore
July	Troy Lynch /Melanie Olson	Nicole Le		Christen Gore
August	Troy Lynch	Nicole Le		Maria Velazquez
September	Melanie Olson	Alena Pavlyk		Maria Velazquez
October	Melanie Olson	Alena Pavlyuk		Diana Pop
November	Melanie Olson	Meridian Magana		Diana Pop
December	Troy Lynch	Meridian Magana		Robbie Folkes

**VERIFICATION**

I, MaryLiz Paulson, declare as follows:

I am an authorized agent of SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, one of the parties in this action, and I am authorized to make this verification for and on behalf of the named Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, and I make this verification for that reason. I have read the foregoing, "DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S RESPONSE TO PLAINTIFFS' REVEAL DOES DEMAND (i.e., INTERROGATORIES, SET ONE)," and know its contents. I have made reasonable efforts to review relevant documents, records and information possessed by or known to the SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY and its employees. Based on such review, I declare that the matters stated in the foregoing document are true and correct to the best of my information and belief.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6 day of May 2025, at Sacramento, CA.

DocuSigned by:  
  
MaryLiz Paulson

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT' SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
 RESPONSE TO PLAINTIFFS' REVEAL DOES DEMAND (i.e., INTERROGATORIES,  
 SET ONE)**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

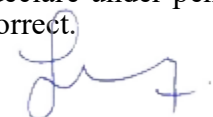
☐: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 8, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 Geraldine Touseon

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
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108 Rinetti Way  
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[edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)  
512-522-8571

May 10, 2024

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED & EMAIL**

Edward P. Garson, Esq.  
Monica Castillo, Esq.  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery Street, Suite 900  
San Francisco, CA 94111  
[\[Edward.Garson@WilsonElser.com\]](mailto:Edward.Garson@WilsonElser.com)  
[\[Monica.Castillo@WilsonElser.com\]](mailto:Monica.Castillo@WilsonElser.com)

**RE: URGENT MEET AND CONFER DEMAND Regarding Overdue and Deficient Discovery Responses – Samuel & Roberts v. Sacramento Housing and Redevelopment Agency, et al., United States District Court, Eastern District of California, Case No. 2:22-cv-01699 – IMMEDIATE ACTION REQUIRED**

Dear Mr. Garson and Ms. Castillo:

This letter serves as a formal meet-and-confer demand pursuant to Federal Rule of Civil Procedure 37(a)(1) and Eastern District of California Local Rule 251(b). We write to address Defendant Sacramento Housing and Redevelopment Agency's ("SHRA") failure to provide discovery in this matter. Specifically, SHRA has:

1. Completely failed to respond to Plaintiffs' Request for Production of Documents served on **April 3, 2025**, which were due on **May 3, 2025** (effectively May 5, 2025).
2. Provided grossly deficient, evasive, and boilerplate responses on **May 8, 2025**, to Plaintiffs' DOE-Identification Request (Interrogatories, Set One) served on **April 8, 2025**.

SHRA's conduct demonstrates a pattern of obstruction and a disregard for its discovery obligations and its duties to maintain and produce records mandated by federal law and its own policies. This letter details the specific records SHRA is obligated to maintain and produce that are responsive to these overdue discovery requests.

**I. FAILURE TO PRODUCE FEDERALLY MANDATED RECORDS AND INFORMATION RESPONSIVE TO APRIL 3, 2025 REQUEST FOR PRODUCTION**

SHRA has provided no documents, no objections, and no privilege log in response to Plaintiffs' Request for Production of Documents served April 3, 2025. This request seeks documents SHRA is legally obligated to create, maintain, and produce. These include, but are not limited to:

### **A. HUD-Mandated Documentation and SHRA Administrative Plan Requirements:**

SHRA must maintain records sufficient to document compliance with federal disability requirements, including detailed records of reasonable accommodation requests, the evaluation process, approvals/denials, and all related correspondence. See 24 C.F.R. § 8.25(b); HUD HCV Guidebook 7420.10G, Ch. 6. SHRA's own 2025 Administrative Plan mandates written records of accommodation requests (e.g., Section 24) and documented rent reasonableness determinations (e.g., Section 11)

**DEMAND:** We demand immediate and complete production of all records responsive to Plaintiffs' RFPs, which fall under these explicit mandates.

### **B. Records from SHRA's Housing Management and Tracking Systems:**

1. We understand SHRA utilizes Housing Management Software, likely Yardi Voyager (as indicated in SHRA's 2022 budget), which should contain detailed logs of all tenant interactions.

**DEMAND:** SHRA must produce all Yardi Voyager (or equivalent system) data and logs pertaining to Plaintiffs David Samuel and Sydney Roberts (and all household members, HCV Case ID t0032944) from 2019 to present, showing: (a) All reasonable accommodation request submissions; (b) Timestamps and content of SHRA responses and actions taken; (c) All "notes," "comments," or similar fields documenting staff actions, deliberations, or communications related to Plaintiffs' requests, RFTAs, hearings, and overall case management.

2. Pursuant to HUD Notice PIH 2021-27, SHRA is required to maintain a centralized Reasonable Accommodation Tracking Log.

**DEMAND:** SHRA must produce its complete Reasonable Accommodation Tracking Log for fiscal years 2022, 2023, and 2024 to date, including at a minimum: request dates, types of accommodations requested, specific details of requests made by or on behalf of Plaintiffs, disposition dates, and detailed reasons for any denials or delays pertaining to Plaintiffs' requests.

### **C. Tenant-Specific Reasonable Accommodation and Hearing Documentation:**

1. Pursuant to HUD Notice PIH 2013-22, PHAs utilize HUD-9886 forms for reasonable accommodation requests.

**DEMAND:** SHRA must produce all HUD-9886 forms (or equivalent internal forms) submitted by or on behalf of Plaintiffs from 2019 to present.

2. PHAs must provide written denial notices for RAs and formal notices regarding hearing procedures. See, e.g., 24 C.F.R. § 982.555.

**DEMAND:** SHRA must produce all correspondence, including approval and denial letters, sent to Plaintiffs regarding all reasonable accommodation requests and RFTA submissions from 2019 to present, and all notices regarding informal hearings.

### **D. HQS Inspection and Rent Reasonableness Records:**

SHRA has obligations regarding HQS inspections and rent reasonableness determinations under 24 C.F.R. § 982.305 and § 982.507.

**DEMAND:** SHRA must produce all HQS inspection reports (or records indicating no inspection was

performed despite an RFTA submission) and all documented rent reasonableness analyses (including specific comparable units and data sources used, not just vendor names) for all RFTAs submitted by or on behalf of Plaintiffs from 2022 to present.

## **II. DEFICIENT RESPONSES TO APRIL 8, 2025 DOE-IDENTIFICATION REQUEST (INTERROGATORIES)**

SHRA's May 8, 2025, Responses to Plaintiffs' Interrogatories are evasive and non-compliant:

- **Interrogatory No. 1 (RACC Membership):** SHRA improperly referred to a general rotation schedule and failed to identify the specific RACC members who reviewed and decided Plaintiffs' individual reasonable accommodation requests resulting in denial letters dated July 08, 2022, November 16, 2022, March 20, 2023, April 03, 2023, and June 28, 2023.
- **Interrogatory No. 3 (Housing Inspectors):** SHRA improperly claimed it does not keep logs and referred to its contractor, Nan McKay. SHRA remains responsible for oversight and for records pertaining to its program. We demand SHRA produce records from Nan McKay related to Plaintiffs or confirm it has requested them for production.
- **Interrogatory No. 2 (Rent Reasonableness Tools):** SHRA listed vendors but failed to specify which tools/reports were actually used for Plaintiffs' RFTAs.  
**DEMAND:** SHRA must provide full and complete supplemental responses to these interrogatories, providing the specific information requested, without boilerplate objections.

## **III. DEMAND FOR IMMEDIATE COMPLIANCE AND NOTICE OF INTENT TO SEEK SANCTIONS**

Given the extensive federal mandates and SHRA's own stated policies requiring the creation and maintenance of these records, any claim that such records do not exist, are not readily accessible, or are unduly burdensome to locate and produce will be viewed as evidence of bad faith and potential spoliation. Plaintiffs put SHRA on notice that its continued failure to produce these documents and provide complete interrogatory answers will compel Plaintiffs to vigorously pursue all available remedies through our pending Motion to Compel, including arguing for findings of functional spoliation, adverse inferences, issue preclusion, monetary sanctions, and any other relief the Court deems appropriate under FRCP 37. See, e.g., *Leon v. IDX Sys. Corp.*, 464 F.3d 951, 958 (9th Cir. 2006); *Silvestri v. Gen. Motors Corp.*, 271 F.3d 583 (4th Cir. 2001).

We demand that SHRA produce all responsive documents to the April 3, 2025 RFPs, provide complete, verified supplemental interrogatory answers to the April 8, 2025 set, and provide a compliant privilege log for any documents withheld under a claim of privilege, no later than **May 14, 2025**.

Failure to fully comply by this deadline will leave Plaintiffs no alternative but to aggressively pursue their pending Motion to Compel, supplemented with this correspondence and SHRA's continued non-compliance, and to seek all available sanctions against SHRA for its flagrant disregard of its discovery obligations.



We also remind you that responses to Plaintiffs' Requests for Production, Interrogatories, and RFAs to Individual SHRA Employees served on April 12, 2025, will be due on or about **May 14, 2025**. Given SHRA's current record of non-compliance, we expect timely and complete responses to these forthcoming requests.

We sincerely hope to resolve these critical discovery deficiencies without further unnecessary litigation.

Very truly yours,

*David Samuel*

David Samuel

*Sydney Roberts*

Sydney Roberts



David Samuel <davidsa@possiblymaybe.com>

---

## FORMAL MEET AND CONFER DEMAND - Overdue & Deficient Discovery Responses - Samuel & Roberts v. SHRA, Case No. 2:22-cv-01699

1 message

---

David Samuel <davidsa@possiblymaybe.com>

Sat, May 10, 2025 at 7:33 AM

To: "Garson, Edward" <edward.garson@wilsonelser.com>, "Castillo, Monica" <monica.castillo@wilsonelser.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Please find attached a formal meet-and-confer letter, dated May 10, 2025, regarding Defendant SHRA's complete failure to respond to Plaintiffs' Request for Production of Documents served on April 3, 2025, and SHRA's grossly deficient responses to Plaintiffs' DOE-Identification Request (Interrogatories, Set One) served on April 8, 2025.

This letter details SHRA's obligations to maintain and produce specific, federally mandated records and information responsive to these overdue discovery requests, and demands immediate compliance by the deadline indicated therein.

A hard copy of this letter has also been sent today via Certified Mail, Return Receipt Requested.

We expect a prompt and substantive response addressing all issues raised in the attached letter.

Best Regards,

David



**05-10-2025-Meet-And-Confer\_April\_Discovery\_Packets\_Demand-Letter.pdf**

84K



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## Roberts; our file 21727.00057; responses to Plaintiff's M & C

2 messages

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**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Mon, May 12, 2025 at 9:56 AM

To: David Samuel <davidsa@possiblymaybe.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, "edfed@possiblymaybe.com" <edfed@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>

Mr. Samuel and Ms. Roberts:

Please see attached correspondence in reply to your May 10, 2025, meet and confer correspondence and your May 8, 2025 emails regarding SHRA's Responses to Requests for Production of Documents, Set One and Interrogatories, Set One

Also attached is your email confirming your extension to SHRA to today, May 12, 2025, for its responses to SHRA's Responses to Requests for Production of Documents, Set One.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

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Thank you.

----- Forwarded message -----

From: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>

To: David Samuel <davidsa@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>

Bcc:

Date: Mon, 5 May 2025 17:56:52 +0000

Subject: RE: Roberts v. SHRA; our file 21727.00057

Mr. Samuel:

Thank you for agreeing to the extension. We will agree to a one-week extension of time for Plaintiffs to file a motion re my clients' pending responses to Plaintiffs' First Request for Production, if needed.

To clarify – we did not state we would withhold discovery until after resolution of the summary judgment motion. To date, the only discovery that is currently due as of today is the one which you have agreed to the extension.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

---

**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>

**Sent:** Monday, May 5, 2025 10:42 AM

**To:** Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>

**Subject:** Re: Roberts v. SHRA; our file 21727.00057

**EXTERNAL EMAIL** This email originated from outside the organization.

Counsel:

We are amenable to a one-week extension for Defendants' responses to the First Request for Production, with responses due by **May 12, 2025**, subject to the following conditions:

1. Plaintiffs do not waive any objections regarding the substance, completeness, or timing of Defendants' responses, including the right to move to compel if responses are inadequate or incomplete.
2. Plaintiffs expressly preserve all rights under Rule 37 given Defendants' letter stating an intent to withhold discovery until after resolution of the summary judgment motion. To date, Defendants have produced no discovery of any kind.
3. Plaintiffs agree to this extension in good faith, but we are concerned about ongoing delay. We request that Defendants confirm they will not oppose a proportional extension to the discovery cutoff, should one be needed as a result of this or similar delays.

Please confirm that this understanding is acceptable.

David

On Mon, May 5, 2025 at 9:42 AM Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)> wrote:

Mr. Roberts and Ms. Samuel:

As you know, our responses to your First Request for Production are due today.

We are requesting a one-week extension, for responses to be due by May 12, 2025.

Please advise if you are amenable to the extension.

Thank you,

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9372 (Direct)  
415.433.0990 (Main)  
[monica.castillo@wilsonelser.com](mailto:monica.castillo@wilsonelser.com)

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at [www.wilsonelser.com](http://www.wilsonelser.com) or refer to any of our offices.

Thank you.

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## 2 attachments

 **RE: Roberts v. SHRA; our file 21727.00057.eml**  
28K

**Response to Meet and Confer re Responses to Plaintiff's Inter(312947750.1).pdf**

169K

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**David Samuel** <davidsa@possiblymaybe.com>

Mon, May 12, 2025 at 11:02 AM

To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Garson, Edward" <edward.garson@wilsonelser.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Counsel:

Please find attached our formal response to your May 12, 2025 letter regarding SHRA's discovery responses. As detailed in the letter, SHRA's objections and incomplete answers remain deficient under the Federal Rules, particularly in light of the fact that this action has now been pending for over two years without meaningful disclosure of key operational or personnel information.

To avoid motion practice, we ask that you provide the following by May 14, 2025:

Full document production, including any required privilege log;

Amended interrogatory responses that address the deficiencies noted; and

Sworn declarations substantiating any undue burden claims.

We remain available to meet and confer in good faith should you believe any of our requests are unclear or require narrowing.

Best Regards,

David

[Quoted text hidden]

**Response\_Letter\_SHRA\_Discovery\_May-12-2025.pdf**

52K

May 12, 2025

**Monica Castillo**  
415.625.9372 (direct)  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)

**VIA E-MAIL ONLY**

David Samuel  
Sydney Roberts  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)

Re: *Brooke Roberts, et al v. Sacramento Housing and Redevelopment Agency, et al.* USDC, Eastern District of California, Case No. 2:22-cv-01699 TLN AC PS  
Our File No: 21727.00057

Dear Mr. Samuel and Ms. Roberts:

This is in response to your May 10, 2025 correspondence regarding SHRA's Responses to Requests for Production of Documents, Set One and Interrogatories, Set One and your May 8, 2025, email regarding SHRA's Responses to Interrogatories, Set One

**A. Requests for Production of Documents, Set One**

On May 5, 2025, you granted our client an extension to May 12, 2025, for responses to this discovery. Responses will be served on May 12, 2025.

**B. Interrogatories, Set One**

**(1) No. 1**

The information sought in the interrogatory would require responding party to engage in burdensome and expensive research. The information sought may be obtained by examining responding party's records. Tus, reference to the general rotation schedule is proper. (See, FRCP 33(d); *Dallion, Inc. v. Allied Chem. Corp.* (10<sup>th</sup> Cir. 1976) 534 F.2<sup>nd</sup> 221, 225)



The response is a complete response to Interrogatory No. 1 as served. Your May 8, 2025, email requesting that responding party “supplement” its response is in fact, a new interrogatory.

(2) No. 3

Interrogatories are not the proper discovery devised for obtaining production of documents. Responding party cannot be compelled to produce documents by way of interrogatories.

The response is a complete response to Interrogatory No. 3 as served. Your May 8, 2025, email requesting that responding party “supplement” its response is in fact, a new interrogatory.

(3) No. 2

The information requested in Interrogatories 2 a, 2 b, and 2c, is the information available to responding party. FRCP 33(b)(1)(B) Responding party does not have information about the specific tools used by its vendors.

The responses are complete responses to Interrogatory No. 2 as served. Your May 8, 2025, email requesting that responding party “supplement” its response is in fact, a new interrogatory, and your request to “produce” is a new request for production of documents.

Best regards,

Wilson Elser Moskowitz Edelman & Dicker LLP



Monica Castillo



David Samuel <davidsa@possiblymaybe.com>

---

## Roberts; our file 21727.00057

2 messages

---

**Castillo, Monica** <Monica.Castillo@wilsonelser.com>

Mon, May 12, 2025 at 10:43 AM

To: David Samuel <davidsa@possiblymaybe.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, "edfed@possiblymaybe.com" <edfed@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>

Attached please find our correspondence in response to your April 16, 2025, correspondence requesting FRCP 30(b) (6) identification of designees.

Monica Castillo  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
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San Francisco, CA 94111  
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Thank you.



**Response to Plaintiffs' 30b6 Request.pdf**

79K

---

**David Samuel** <davidsa@possiblymaybe.com>

Mon, May 12, 2025 at 11:13 AM

To: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Garson, Edward" <edward.garson@wilsonelser.com>, "Maddy, David and Artemis Samuel" <home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Counsel:

Please find attached our response to your May 12, 2025 letter declining to identify SHRA's Rule 30(b)(6) designees. As explained in the letter, your refusal to engage in any advance discussion about designated witnesses or topic scope is inconsistent with both the spirit and letter of the Federal Rules, as well as Local Rule 251(b) and relevant case law.

Our original request of April 16, 2025 was made in good faith to streamline discovery, minimize burden, and allow both parties adequate preparation time. The subject areas were outlined in our initial communication and are reiterated in the attached letter. We remain available to confer if SHRA is willing to participate in resolving this issue cooperatively.

Please confirm by May 15, 2025 whether SHRA intends to engage in a meet-and-confer regarding Rule 30(b)(6) designations. If not, we will proceed with formal notice and reserve all rights to seek appropriate relief under Rule 37.

Best Regards,

David

[Quoted text hidden]



**Response\_Letter\_30b6\_Avoidance\_May-13-2025.pdf**

28K

May 12, 2025

Monica Castillo  
415.625.9372 (direct)  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)

**VIA E-EMAIL ONLY**

David Samuel  
Sydney Roberts  
[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)  
[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
[edfed@possiblymaybe.com](mailto:edfed@possiblymaybe.com)

Re: *Brooke Roberts, et al v. Sacramento Housing and Redevelopment Agency, et al.* USDC, Eastern District of California, Case No. 2:22-cv-01699 TLN AC PS  
Our File No: 21727.00057

Dear Mr. Samuel and Ms. Roberts:

This is in response to your April 16, 2025 correspondence requesting the identification of Rule 30(b)(6) designees.

The letter is an improper request. FRCP Rule 30(b)(6) requires a Notice of Deposition for a party and a subpoena for a non-party.

Best regards,

Wilson Elser Moskowitz Edelman & Dicker LLP



Monica Castillo

David Samuel  
Sydney Roberts  
108 Rinetti Way  
Rio Linda, CA 95673  
home@possiblymaybe.com

May 13, 2025

VIA EMAIL  
Monica Castillo  
Edward Garson  
Wilson Elser Moskowitz Edelman & Dicker LLP  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)  
[Edward.Garson@wilsonelser.com](mailto:Edward.Garson@wilsonelser.com)

Re: Roberts et al. v. Sacramento Housing and Redevelopment Agency et al.

Case No. 2:22-cv-01699 DJC AC

Dear Ms. Castillo and Mr. Garson:

We are in receipt of your May 12, 2025 letter refusing to identify SHRA's Rule 30(b)(6) designees in response to our April 16 request. Respectfully, your position is both premature and inconsistent with the Federal Rules' cooperative discovery framework.

Courts within the Ninth Circuit have repeatedly encouraged parties to confer in advance of a formal Rule 30(b)(6) notice to promote efficiency and avoid unnecessary disputes. See U.S. E.E.O.C. v. Thorman & Wright Corp., No. CIV S-07-0047 LKK-GGH, 2009 WL 764466, at \*4 (E.D. Cal. Mar. 19, 2009) ("While Rule 30(b)(6) does not require pre-deposition conferences, such cooperation is consistent with the spirit of the discovery rules and Rule 1."). Moreover, Local Rule 251(b) and the Court's Standing Order both emphasize early and meaningful engagement to resolve discovery issues without court intervention.

Our April 16 letter identified general subject areas for the anticipated Rule 30(b)(6) deposition, including:

- SHRA's voucher approval and affordability determination process;
- RFTA approval timelines and related delays;
- Geographic distribution of voucher utilization;
- Composition and procedures of the Reasonable Accommodation Committee.

Identifying potential designees in advance would allow both parties to avoid scheduling conflicts, ensure the witness is properly prepared, and potentially limit the number of deposition topics noticed all of which serve to reduce burden and promote efficiency. This approach is routine in federal discovery and consistent with your own professional obligations under Rule 1 and Rule 26(g).

Unfortunately, your refusal to engage follows a broader pattern in which SHRA has declined to provide basic information about its organizational structure, refused to identify staff involved in core decisions, and failed to comply with Rule 26(a) disclosure obligations. We remain willing to confer in good faith to avoid unnecessary motion practice.

Please confirm by May 14 whether SHRA will engage in a good-faith discussion regarding Rule 30(b)(6) topic coverage and witness availability. If not, we will proceed with formal notice and reserve the right to seek fees and sanctions under Rule 37.

Sincerely,

David Samuel  
Sydney Roberts

EDWARD P. GARSON (SBN 96786)  
[Edward.Garson@WilsonElser.com](mailto:Edward.Garson@WilsonElser.com)  
 MONICA C. CASTILLO (SBN 146154)  
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Attorneys for Defendants SACRAMENTO  
 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LA SHELLE DOZIER'S  
 RESPONSES TO PLAINTIFFS' REQUEST  
 FOR ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, LA SHELLE DOZIER

SET NO.: One (1)

//

//

//

1 Defendant, LA SHELLE DOZIER, by and through its attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil



1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
8 without prejudice to Responding Party's right to present at trial, or in support or opposition of any  
9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
14 for Admissions below as though set forth fully therein.

15 **RESPONSES TO REQUESTS FOR ADMISSION**

16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that SHRA is a public entity subject to Title II of the Americans with Disabilities Act.

18 **RESPONSE TO REQUEST NO. 1:**

19 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
20 to provide responses to these requests and reserves the right to supplement and/or amend this  
21 response pursuant to FRCP 26(e).

22 **REQUEST FOR ADMISSION NO. 2:**

23 Admit that you are the signatory on SHRA's Voluntary Compliance Agreement with HUD  
24 dated March 12, 2020.

25 **RESPONSE TO REQUEST NO. 2:**

26 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
27 to provide responses to these requests and reserves the right to supplement and/or amend this  
28 response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 3:**

Admit that the Voluntary Compliance Agreement requires SHRA to provide effective communication and accessible grievance procedures under Section 504 and the ADA.

**RESPONSE TO REQUEST NO. 3:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 4:**

Admit that SHRA failed to complete or issue a written decision following Plaintiffs' informal hearing originally scheduled for April 20, 2023 (and held on June 2, 2023), and also failed to issue a decision after their prior hearing held on September 12, 2022.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 5:**

Admit that SHRA had knowledge that Plaintiffs had moved to a new address and yet continued to issue housing assistance payments to a landlord at their former residence for over one year.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 6:**

Admit that you received at least one email directly from Plaintiffs during 2022 or 2023

1 regarding a request for hearing access, real-time transcription, or another disability-related  
2 accommodation.

3 **RESPONSE TO REQUEST NO. 6:**

4         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
5 Without waiving said objection, this Request for Admission is denied. Responding Party is  
6 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
7 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

8 **REQUEST FOR ADMISSION NO. 7:**

9         Admit that Plaintiffs notified you of concerns regarding discrimination or cancellation of  
10 hearings in violation of 24 C.F.R. § 982.555 and ADA Title II.

11 **RESPONSE TO REQUEST NO. 7:**

12         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
13 Without waiving said objection, this Request for Admission is denied. Responding Party is  
14 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
15 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

16 **REQUEST FOR ADMISSION NO. 8:**

17         Admit that SHRA did not provide Plaintiffs with an opportunity to inspect their case file  
18 prior to one or more scheduled informal hearings.

19 **RESPONSE TO REQUEST NO. 8:**

20         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
21 Without waiving said objection, this Request for Admission is denied. Responding Party is  
22 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
23 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

24 **REQUEST FOR ADMISSION NO. 9:**

25         Admit that as Executive Director, you had authority to intervene, escalate, or override  
26 procedural decisions regarding informal hearings or reasonable accommodation denials.

27 **RESPONSE TO REQUEST NO. 9:**

28         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.

Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 10:**

Admit that SHRA does not have a written policy requiring that reasonable accommodation complaints or hearing cancellations be logged and tracked by Executive Management or Human Resources.

**RESPONSE TO REQUEST NO. 10:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 11:**

Admit that you personally received one or more emails from Plaintiffs in 2023 requesting reasonable accommodations related to “rent reasonableness,” informal hearing access, and communication by email.

**RESPONSE TO REQUEST NO. 11:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 12:**

Admit that despite receiving multiple written complaints and accommodation requests from Plaintiffs, SHRA did not provide written notice of denial, did not issue formal explanations for adverse actions, and did not complete or schedule requested hearings within the timelines described in SHRA’s administrative plan.

**RESPONSE TO REQUEST NO. 12:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms.

1 Without waiving said objection, this Request for Admission is denied. Responding Party is  
2 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
3 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

4  
5  
6 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

7 By: 

8 EDWARD P. GARSON  
9 MONICA C. CASTILLO  
10 CHANDNI B. MISTRY  
11 Attorneys for Defendants  
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**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LA SHELLE DOZIER'S RESPONSES TO PLAINTIFFS' REQUEST FOR ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

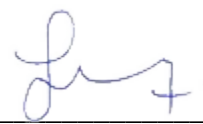
☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
108 Rinetti Way  
Rio Linda, CA 95673

[home@possiblymaybe.com](mailto:home@possiblymaybe.com)  
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**WILSON ELSEER MOSKOWITZ****EDELMAN & DICKER LLP**

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Attorneys for Defendants SACRAMENTO  
 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LA SHELLE DOZIER'S  
 RESPONSES TO PLAINTIFFS' REQUEST  
 FOR ADMISSION, SET TWO**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, LA SHELLE DOZIER

SET NO.: Two (2)

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1 Defendant, LA SHELLE DOZIER, by and through its attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set Two, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition of any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

#### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

##### 16 **REQUEST FOR ADMISSION NO. 6:**

17 Admit that you received at least one email directly from Plaintiffs during 2022 or 2023  
 18 regarding a request for hearing access, real-time transcription, or another disability-related  
 19 accommodation.

##### 20 **RESPONSE TO REQUEST NO. 6:**

21 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 22 Without waiving said objection, this Request for Admission is denied. Responding Party is  
 23 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
 24 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

##### 25 **REQUEST FOR ADMISSION NO. 7:**

26 Admit that Plaintiffs notified you of concerns regarding discrimination or cancellation of  
 27 hearings in violation of 24 C.F.R. § 982.555 and ADA Title II.

28 //

**RESPONSE TO REQUEST NO. 7:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 8:**

Admit that SHRA did not provide Plaintiffs with an opportunity to inspect their case file prior to one or more scheduled informal hearings.

**RESPONSE TO REQUEST NO. 8:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 9:**

Admit that as Executive Director, you had authority to intervene, escalate, or override procedural decisions regarding informal hearings or reasonable accommodation denials.

**RESPONSE TO REQUEST NO. 9:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 10:**

Admit that SHRA does not have a written policy requiring that reasonable accommodation complaints or hearing cancellations be logged and tracked by Executive Management or Human Resources.

**RESPONSE TO REQUEST NO. 10:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is

continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 11:**

Admit that you personally received one or more emails from Plaintiffs in 2023 requesting reasonable accommodations related to “rent reasonableness,” informal hearing access, and communication by email.

**RESPONSE TO REQUEST NO. 11:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 12:**

Admit that despite receiving multiple written complaints and accommodation requests from Plaintiffs, SHRA did not provide written notice of denial, did not issue formal explanations for adverse actions, and did not complete or schedule requested hearings within the timelines described in SHRA’s administrative plan.

**RESPONSE TO REQUEST NO. 12:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LA SHELLE DOZIER'S RESPONSES TO PLAINTIFFS' REQUEST FOR ADMISSION, SET TWO**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

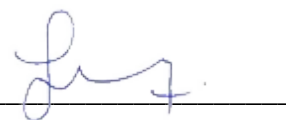
☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LA SHELLE DOZIER'S  
 RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, LA SHELLE DOZIER

SET NO.: One (1)

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1 Defendant, LA SHELLE DOZIER, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

24 //

25 //

26 //

27 //

28 //

**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Describe in detail your current duties and responsibilities as Executive Director of SHRA, including your supervisory authority over SHRA's Housing Choice Voucher program and any role you play in reviewing or approving policies related to participant accommodations or informal hearings.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 2:**

Identify the dates and roles of all positions you have held at SHRA, including your role as Director or Manager of the Housing Choice Voucher (HCV) unit. For each position, describe your responsibilities regarding policy development and compliance monitoring.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding employment information over an unspecified time period that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

**INTERROGATORY NO. 3:**

Describe the policies and procedures in effect between 2020 and 2024 regarding how SHRA

schedules, conducts, records, and resolves informal hearings under 24 C.F.R. § 982.555.

**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 4:**

Describe the procedures used by SHRA to ensure that participants with disabilities receive effective communication and access to services, including what auxiliary aids or reasonable modifications are offered in hearings or inspections.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 4a and Interrogatory 4b for clarity.

**INTERROGATORY NO. 4a:**

Describe the procedures used by SHRA to ensure that participants with disabilities receive effective communication and access to services.

**RESPONSE TO INTERROGATORY NO. 4a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds

1 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
2 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
3 reasonably calculated to lead to the discovery of admissible evidence.

4 **INTERROGATORY NO. 4b:**

5 Describe what auxiliary aids or reasonable modifications are offered in hearings or  
6 inspections.

7 **RESPONSE TO INTERROGATORY NO. 4b:**

8 Responding Party incorporates its Preliminary Statement and General Objections as though  
9 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
10 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
11 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
12 reasonably calculated to lead to the discovery of admissible evidence.

13 **INTERROGATORY NO. 5:**

14 Identify all individuals who served on SHRA's Reasonable Accommodation Committee  
15 between 2020 and 2024, and describe their roles, responsibilities, and qualifications.

16 **RESPONSE TO INTERROGATORY NO. 5:**

17 Responding Party incorporates its Preliminary Statement and General Objections as though  
18 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
19 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
20 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
21 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
22 objects to this interrogatory because it is vague, ambiguous, and overly burdensome because of the  
23 number of individuals on SHRA's Reasonable Accommodation Committee from 2020 to 2024 and  
24 the high level of detail this request seeks for each individual that is neither relevant to the incident  
25 giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

26 **INTERROGATORY NO. 6:**

27 Describe the grievance and appeal process available to Housing Choice Voucher  
28 participants who allege discrimination, denial of access to services, or denial of hearing rights.

**RESPONSE TO INTERROGATORY NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 7:**

State whether you received or reviewed any direct communications from Plaintiffs in 2022 or 2023 regarding informal hearing delays, denial of accommodations, or disability discrimination, and describe any actions you took or directed others to take.

**RESPONSE TO INTERROGATORY NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as three separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatories 7a through 7c for clarity.

**INTERROGATORY 7a:**

State whether you received or reviewed any direct communications from Plaintiffs in 2022 or 2023 regarding informal hearing delays, denial of accommodations, or disability discrimination.

**RESPONSE TO INTERROGATORY 7a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not

1 reasonably calculated to lead to the discovery of admissible evidence.

2 **INTERROGATORY 7b:**

3 Describe any actions you took regarding direct communications from Plaintiffs in 2022 or  
4 2023 regarding informal hearing delays, denial of accommodations, or disability discrimination.

5 **RESPONSE TO INTERROGATORY 7b:**

6 Responding Party incorporates its Preliminary Statement and General Objections as though  
7 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
8 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
9 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
10 reasonably calculated to lead to the discovery of admissible evidence.

11 **INTERROGATORY 7c:**

12 Describe any actions you directed other to take regarding direct communications from  
13 Plaintiffs in 2022 or 2023 regarding informal hearing delays, denial of accommodations, or  
14 disability discrimination

15 **RESPONSE TO INTERROGATORY 7c:**

16 Responding Party incorporates its Preliminary Statement and General Objections as though  
17 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
18 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
19 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
20 reasonably calculated to lead to the discovery of admissible evidence.

21 **INTERROGATORY NO. 8:**

22 Identify all internal SHRA memoranda, training materials, or guidance documents issued  
23 from 2020 to 2024 regarding due process obligations under 24 C.F.R. § 982.555 and the ADA.

24 **RESPONSE TO INTERROGATORY NO. 8:**

25 Responding Party incorporates its Preliminary Statement and General Objections as though  
26 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
27 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
28 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not



1 reasonably calculated to lead to the discovery of admissible evidence.

2 **INTERROGATORY NO. 9:**

3 Describe SHRA's policies from 2020 to 2024 for handling multiple RFTA submissions by  
4 a voucher holder and whether exceptions were allowed as a reasonable accommodation.

5 **RESPONSE TO INTERROGATORY NO. 9:**

6 Responding Party incorporates its Preliminary Statement and General Objections as though  
7 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
8 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
9 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
10 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
11 objects to this interrogatory because it is vague, ambiguous, and overly burdensome. Responding  
12 Party further objects to the terms "exceptions" and "RFTA" as they are vague, subjective,  
13 ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to  
14 this interrogatory to the extent that it is compound. Responding Party will treat this as two separate  
15 Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the  
16 separate Interrogatories as Interrogatories 9a through 9b for clarity.

17 **INTERROGATORY NO. 9a:**

18 Describe SHRA's policies from 2020 to 2024 for handling multiple RFTA submissions by  
19 a voucher holder.

20 **RESPONSE TO INTERROGATORY NO. 9a:**

21 Responding Party incorporates its Preliminary Statement and General Objections as though  
22 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
23 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
24 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
25 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
26 objects to the term "RFTA" as it is vague, subjective, ambiguous, undefined, and subject to multiple  
27 interpretations.

28 //

**INTERROGATORY NO. 9b:**

Describe SHRA's policies from 2020 to 2024 regarding whether exceptions were allowed as a reasonable accommodation.

**RESPONSE TO INTERROGATORY NO. 9b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term "exceptions" as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 10:**

Identify any oversight reports, audits, or compliance reviews SHRA received from HUD between 2020 and 2024 that identified concerns about informal hearing practices or disability access.

**RESPONSE TO INTERROGATORY NO. 10:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 11:**

Identify all emails, letters, or communications received by you from Plaintiffs or their representatives between 2022 and 2024 regarding allegations of disability discrimination, denial of due process, or failure to accommodate.

**RESPONSE TO INTERROGATORY NO. 11:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds

1 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
2 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
3 reasonably calculated to lead to the discovery of admissible evidence.

4 **INTERROGATORY NO. 12:**

5 Describe any steps you personally took, or directed others to take, in response to the multiple  
6 emails and communications you received from Plaintiffs in 2023 alleging disability discrimination,  
7 failure to accommodate, denial of access to program services, voiding of RFTAs, or cancellation of  
8 informal hearings. Include dates and individuals involved in evaluating or responding to each  
9 concern.

10 **RESPONSE TO INTERROGATORY NO. 12:**

11 Responding Party incorporates its Preliminary Statement and General Objections as though  
12 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
13 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
14 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
15 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
16 objects to this interrogatory as it assumes facts not in evidence, specifically that Responding Party  
17 received “multiple emails and communications . . . from Plaintiffs in 2023 alleging disability  
18 discrimination, failure to accommodate, denial of access to program services, voiding of RFTAs,  
19 or cancellation of informal hearings.” Responding Party further objects to the term “RFTAs” as it  
20 is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

21 **INTERROGATORY NO. 13:**

22 Identify any SHRA internal procedures in effect between 2020 and 2024 requiring that staff  
23 escalate unresolved accommodation requests or civil rights complaints to your office or the  
24 Executive Director.

25 **RESPONSE TO INTERROGATORY NO. 13:**

26 Responding Party incorporates its Preliminary Statement and General Objections as though  
27 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
28 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects

1 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
2 reasonably calculated to lead to the discovery of admissible evidence.

3 **INTERROGATORY NO. 14:**

4 Describe the policies in place at SHRA for investigating staff misconduct, retaliation, or  
5 failure to comply with the ADA, Section 504, or Title VI.

6 **RESPONSE TO INTERROGATORY NO. 14:**

7 Responding Party incorporates its Preliminary Statement and General Objections as though  
8 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
9 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
10 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
11 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
12 objects to the term “retaliation” as it is vague, subjective, ambiguous, unclear as to what it is  
13 referring to, undefined, and subject to multiple interpretations.

14 **INTERROGATORY NO. 15:**

15 State whether SHRA has ever disciplined, reassigned, or retrained any employee based on  
16 a substantiated finding of discrimination or failure to accommodate between 2018 and 2024. If so,  
17 identify the employee(s), nature of misconduct, and resulting action.

18 **RESPONSE TO INTERROGATORY NO. 15:**

19 Responding Party incorporates its Preliminary Statement and General Objections as though  
20 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
21 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
22 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
23 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
24 objects to this interrogatory because it is vague, ambiguous, and overly burdensome. Responding  
25 Party further objects to this interrogatory to the extent that it is compound. Responding Party will  
26 treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule  
27 33(a)(1), and identify the separate Interrogatories as Interrogatories 15a through 15b for clarity.

28 //

**INTERROGATORY NO. 15a:**

State whether SHRA has ever disciplined, reassigned, or retrained any employee based on a substantiated finding of discrimination or failure to accommodate between 2018 and 2024.

**RESPONSE TO INTERROGATORY NO. 15a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 15b:**

If your answer to Interrogatory No. 15a was yes, identify the employee(s), nature of misconduct, and resulting action.

**RESPONSE TO INTERROGATORY NO. 15b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, violates third party's right to privacy, and is not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LA SHELLE DOZIER'S RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon

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 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LA SHELLE DOZIER'S  
 RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET TWO**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, LA SHELLE DOZIER

SET NO.: Two (2)

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1 Defendant, LA SHELLE DOZIER, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set Two, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 11:**

Identify all emails, letters, or communications received by you from Plaintiffs or their representatives between 2022 and 2024 regarding allegations of disability discrimination, denial of due process, or failure to accommodate.

**RESPONSE TO INTERROGATORY NO. 11:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory as entirely duplicative of Plaintiffs' Interrogatories to La Shelle Dozier, Set One, Interrogatory No. 11. Responding Party continues to object to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 12:**

Describe any steps you personally took, or directed others to take, in response to the multiple emails and communications you received from Plaintiffs in 2023 alleging disability discrimination, failure to accommodate, denial of access to program services, voiding of RFTAs, or cancellation of informal hearings. Include dates and individuals involved in evaluating or responding to each concern.

**RESPONSE TO INTERROGATORY NO. 12:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory as it assumes facts not in evidence, specifically that Responding Party received "multiple emails and communications . . . from Plaintiffs in 2023 alleging disability discrimination, failure to accommodate, denial of access to program services, voiding of RFTAs, or cancellation of

informal hearings.” Responding Party further objects to the term “RFTA” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 13:**

Identify any SHRA internal procedures in effect between 2020 and 2024 requiring that staff escalate unresolved accommodation requests or civil rights complaints to your office or the Executive Director.

**RESPONSE TO INTERROGATORY NO. 13:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory as entirely duplicative of Plaintiffs’ Interrogatories to La Shelle Dozier, Set One, Interrogatory No. 13. Responding Party continues to object to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 14:**

Describe the policies in place at SHRA for investigating staff misconduct, retaliation, or failure to comply with the ADA, Section 504, or Title VI.

**RESPONSE TO INTERROGATORY NO. 14:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory as entirely duplicative of Plaintiffs’ Interrogatories to La Shelle Dozier, Set One, Interrogatory No. 14. Responding Party continues to object to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “retaliation” as it is vague, subjective, ambiguous, unclear as to what it is referring to, undefined, and subject to multiple interpretations.

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**INTERROGATORY NO. 15:**

State whether SHRA has ever disciplined, reassigned, or retrained any employee based on a substantiated finding of discrimination or failure to accommodate between 2018 and 2024. If so, identify the employee(s), nature of misconduct, and resulting action.

**RESPONSE TO INTERROGATORY NO. 15:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory as entirely duplicative of Plaintiffs' Interrogatories to La Shelle Dozier, Set One, Interrogatory No. 15. Responding Party continues to object to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatories 15a through 15b for clarity.

**INTERROGATORY NO. 15a:**

State whether SHRA has ever disciplined, reassigned, or retrained any employee based on a substantiated finding of discrimination or failure to accommodate between 2018 and 2024.

**RESPONSE TO INTERROGATORY NO. 15a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 15b:**

If your answer to Interrogatory No. 15a was yes, identify the employee(s), nature of misconduct, and resulting action.


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**RESPONSE TO INTERROGATORY NO. 15b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party further objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, violates third party's right to privacy, and is not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LA SHELLE DOZIER'S RESPONSES TO PLAINTIFFS'  
INTERROGATORIES, SET TWO**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Geraldine Touson

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 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT MARYLIZ PAULSON'S  
 RESPONSES TO PLAINTIFFS' REQUEST  
 FOR ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, MARYLIZ PAULSON

SET NO.: One (1)

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1 Defendant, MARYLIZ PAULSON, by and through her attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition to any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

#### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

##### 16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that you are the signatory on multiple reasonable accommodation denial letters issued  
 18 to Plaintiffs between 2022 and 2023.

##### 19 **RESPONSE TO REQUEST NO. 1:**

20 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
 21 to provide responses to these requests and reserves the right to supplement and/or amend this  
 22 response pursuant to FRCP 26(e).

##### 23 **REQUEST FOR ADMISSION NO. 2:**

24 Admit that SHRA's 2020 Voluntary Compliance Agreement with HUD requires the  
 25 designation of a Section 504 Coordinator and mandates compliance with 24 C.F.R. § 8.53.

##### 26 **RESPONSE TO REQUEST NO. 2:**

27 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
 28 to provide responses to these requests and reserves the right to supplement and/or amend this

1 response pursuant to FRCP 26(e).

2 **REQUEST FOR ADMISSION NO. 3:**

3 Admit that SHRA has not consistently provided written notice of reasonable accommodation  
4 denials to Plaintiffs.

5 **RESPONSE TO REQUEST NO. 3:**

6 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
7 Without waiving said objection, this Request for Admission is denied. Responding Party is  
8 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
9 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

10 **REQUEST FOR ADMISSION NO. 4:**

11 Admit that SHRA has denied reasonable accommodation requests submitted by Plaintiffs  
12 without conducting an individualized assessment of their disability-related needs.

13 **RESPONSE TO REQUEST NO. 4:**

14 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
15 Without waiving said objection, this Request for Admission is denied. Responding Party is  
16 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
17 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

18 **REQUEST FOR ADMISSION NO. 5:**

19 Admit that Plaintiffs submitted multiple requests for communication accommodations  
20 (including email, real-time transcription, and captioning) which were either denied or ignored.

21 **RESPONSE TO REQUEST NO. 5:**

22 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
23 to provide responses to these requests and reserves the right to supplement and/or amend this  
24 response pursuant to FRCP 26(e).

25 **REQUEST FOR ADMISSION NO. 6:**

26 Admit that SHRA has cancelled or failed to conduct multiple informal hearings requested by  
27 Plaintiffs without issuing a written explanation or decision.

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**RESPONSE TO REQUEST NO. 6:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 7:**

Admit that as the HCV Program Manager and participant in the Reasonable Accommodation Committee, you had authority to intervene in accommodation decisions made by subordinate SHRA staff.

**RESPONSE TO REQUEST NO. 7:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 8:**

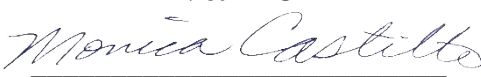
Admit that SHRA policy does not expressly require tracking of informal hearing cancellations or accommodation denials in a centralized database accessible by executive management.

**RESPONSE TO REQUEST NO. 8:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By: 

EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT MARYLIZ PAULSON'S RESPONSES TO PLAINTIFFS'  
REQUEST FOR ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touseon

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 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT MARYLIZ PAULSON'S  
 RESPONSES TO PLAINTIFFS' REQUEST  
 FOR ADMISSION, SET TWO**

[FED. R. CIV. P. 26(A)(1)]

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, MARYLIZ PAULSON

SET NO.: Two (2)

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1 Defendant, MARYLIZ PAULSON, by and through her attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set Two, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition to any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

#### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

##### 16 **REQUEST FOR ADMISSION NO. 9:**

17 Admit that you personally received one or more emails from Plaintiffs requesting reasonable  
 18 accommodations and hearing access.

##### 19 **RESPONSE TO REQUEST NO. 9:**

20 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 21 Without waiving said objection, this Request for Admission is denied. Responding Party is  
 22 continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests  
 23 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

##### 24 **REQUEST FOR ADMISSION NO. 10:**

25 Admit that you were made aware, in writing, of Plaintiffs' request for communication  
 26 accommodations including the use of email and real-time captioning.

##### 27 **RESPONSE TO REQUEST NO. 10:**

28 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.

Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 11:**

Admit that Plaintiffs' requests for communication accommodations were not consistently honored by SHRA.

**RESPONSE TO REQUEST NO. 11:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 12:**

Admit that SHRA failed to reschedule or complete at least two informal hearings requested by Plaintiffs.

**RESPONSE TO REQUEST NO. 12:**

Denied. Responding Party is continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 13:**

Admit that SHRA failed to provide Plaintiffs with written decisions or explanations following one or more denied reasonable accommodation requests.

**RESPONSE TO REQUEST NO. 13:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, this Request for Admission is denied. Responding Party is continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

**REQUEST FOR ADMISSION NO. 14:**

Admit that SHRA does not maintain a centralized or accessible database to log and monitor

1 reasonable accommodation denials.

2 **RESPONSE TO REQUEST NO. 14:**

3         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
4 Without waiving said objection, this Request for Admission is denied. Responding Party is  
5 continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests  
6 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

7 **REQUEST FOR ADMISSION NO. 15:**

8         Admit that you were aware of HUD's findings or guidance related to SHRA's obligations  
9 under Section 504 and the ADA as of 2020.

10 **RESPONSE TO REQUEST NO. 15:**

11         Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
12 Without waiving said objection, this Request for Admission is denied. Responding Party is  
13 continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests  
14 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

15 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

17 *Monica Castillo*  
By: \_\_\_\_\_

18 EDWARD P. GARSON  
19 MONICA C. CASTILLO  
20 CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT MARYLIZ PAULSON'S RESPONSES TO PLAINTIFF'S  
REQUEST FOR ADMISSION, SET TWO**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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JACKSON, LISA MACIAS, TIFFANY BROWN,  
and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT MARYLIZ PAULSON'S  
RESPONSES TO PLAINTIFFS'  
INTERROGATORIES, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, MARYLIZ PAULSON

SET NO.: One (1)

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1 Defendant, MARYLIZ PAULSON, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discovery additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your current title, responsibilities, and role at SHRA, including your authority over reasonable accommodation procedures, the Housing Choice Voucher program, and any compliance obligations under Section 504 of the Rehabilitation Act or Title II of the Americans with Disabilities Act.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “authority” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 2:**

Identify all job titles and roles you have held within SHRA since 2018 and describe the responsibilities associated with each position.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding employment information from over seven years ago that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence. Responding Party further objects to the term “roles” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 3:**

State whether you are or have been designated as SHRA's Section 504 Coordinator pursuant to 24 C.F.R. § 8.53(a) and PIH Notice 2010-26, and if not, identify the person(s) who served in that capacity during your employment.

**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 3a and Interrogatory 3b for clarity. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 3a:**

State whether you are or have been designated as SHRA's Section 504 Coordinator pursuant to 24 C.F.R. § 8.53(a) and PIH Notice 2010-26.

**RESPONSE TO INTERROGATORY NO. 3a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 3b:**

If your answer to Interrogatory No. 3a is no, identify the person(s) who served in the capacity of SHRA's Section 504 Coordinator pursuant to 24 C.F.R. § 8.53(a) and PIH Notice 2010-26 during your employment.

**RESPONSE TO INTERROGATORY NO. 3b:**

Responding Party incorporates its Preliminary Statement and General Objections as though

1 fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad,  
2 vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of  
3 admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party  
4 reserves the right to supplement and/or amend its response.

5 **INTERROGATORY NO. 4:**

6 Describe your role in reviewing, approving, or denying reasonable accommodation requests  
7 submitted by program participants between 2022 and 2024.

8 **RESPONSE TO INTERROGATORY NO. 4:**

9 Responding Party incorporates its Preliminary Statement and General Objections as though  
10 fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad,  
11 vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of  
12 admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party  
13 reserves the right to supplement and/or amend its response.

14 **INTERROGATORY NO. 5:**

15 Identify all individuals who served on SHRA's Reasonable Accommodation Committee  
16 between 2020 and 2024, and describe their titles, roles, and the process used by the Committee to  
17 review requests.

18 **RESPONSE TO INTERROGATORY NO. 5:**

19 Responding Party incorporates its Preliminary Statement and General Objections as though  
20 fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad,  
21 vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of  
22 admissible evidence. Responding Party further objects to this interrogatory because it is vague,  
23 ambiguous, and overly burdensome because of the number of individuals on SHRA's Reasonable  
24 Accommodation Committee from 2020 to 2024 and the high level of detail this request seeks for  
25 each individual that is neither relevant to the incident giving rise to this litigation, nor reasonably  
26 calculated to lead to admissible evidence. Responding Party further objects to this interrogatory to  
27 the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as  
28 provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate

Interrogatories as Interrogatory 5a and Interrogatory 5b for clarity. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY 5a:**

Identify all individuals who served on SHRA's Reasonable Accommodation Committee between 2020 and 2024, and describe their titles and roles.

**RESPONSE TO INTERROGATORY 5a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because of the number of individuals on SHRA's Reasonable Accommodation Committee from 2020 to 2024 and the high level of detail this request seeks for each individual that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY 5b:**

Identify the process used by SHRA's Reasonable Accommodation Committee to review requests.

**RESPONSE TO INTERROGATORY 5b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 6:**

Identify the training you have received between 2020 and 2024 regarding your obligations under Section 504, the ADA, the Fair Housing Act, and California civil rights laws.

**RESPONSE TO INTERROGATORY NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 7:**

Describe the procedures in effect at SHRA from 2020 through 2024 for documenting, responding to, and providing written decisions for reasonable accommodation requests.

**RESPONSE TO INTERROGATORY NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 8:**

Describe the procedures in effect at SHRA from 2020 through 2024 for responding to complaints about informal hearing cancellations, failure to accommodate communication needs, or failure to provide case file access prior to hearings.

**RESPONSE TO INTERROGATORY NO. 8:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 9:**

Identify each reasonable accommodation request submitted by Plaintiffs that you reviewed, participated in, or denied, including the date of request, the decision, and the reason for denial.



**RESPONSE TO INTERROGATORY NO. 9:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “participated in” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 10**

Identify any complaints, concerns, or internal warnings brought to your attention between 2020 and 2024 alleging discrimination or noncompliance with Section 504 or the ADA by SHRA staff or contractors.

**RESPONSE TO INTERROGATORY NO. 10:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “concerns” and “internal warnings” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

Dated: May 12, 2025

**WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT MARYLIZ PAULSON'S RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon

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TORY LYNCH, TANYA CRUZ, TAMEKA  
JACKSON, LISA MACIAS, TIFFANY BROWN,  
and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT MARYLIZ PAULSON'S  
RESPONSES TO PLAINTIFFS'  
INTERROGATORIES, SET TWO**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, MARYLIZ PAULSON

SET NO.: Two (2)

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1 Defendant, MARYLIZ PAULSON, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set Two, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

24 //

25 //

26 //

27 //

28 //

**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 11:**

Identify all emails, letters, or communications you received from Plaintiffs in 2022 or 2023 regarding reasonable accommodations, effective communication, hearing access, or allegations of discrimination.

**RESPONSE TO INTERROGATORY NO. 11:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 12:**

Describe any steps you personally took, or directed others to take, in response to complaints from Plaintiffs regarding the cancellation of hearings, refusal to provide auxiliary aids, or denial of housing opportunities.

**RESPONSE TO INTERROGATORY NO. 12:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as six separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatories 12a through 12f for clarity. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY 12a:**

Describe any steps you personally took in response to complaints from Plaintiffs regarding the cancellation of hearings.

**RESPONSE TO INTERROGATORY 12a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the extent that this interrogatory assumes facts not in evidence, specifically, that hearings were cancelled. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY 12b:**

Describe any steps you directed others to take in response to complaints from Plaintiffs regarding the cancellation of hearings.

**RESPONSE TO INTERROGATORY 12b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the extent that this interrogatory assumes facts not in evidence, specifically, that hearings were cancelled. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY 12c:**

Describe any steps you personally took in response to complaints from Plaintiffs regarding the refusal to provide auxiliary aids.

**RESPONSE TO INTERROGATORY 12c:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the extent that this interrogatory assumes facts not in evidence, specifically, that there was a request for auxiliary aids



1 and a subsequent refusal to provide the requested auxiliary aids. Discovery and investigation are  
2 incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its  
3 response.

4 **INTERROGATORY 12d:**

5 Describe any steps you directed others to take in response to complaints from Plaintiffs  
6 regarding the refusal to provide auxiliary aids.

7 **RESPONSE TO INTERROGATORY 12d:**

8 Responding Party incorporates its Preliminary Statement and General Objections as though  
9 fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as  
10 to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the  
11 discovery of admissible evidence. Responding Party further objects to the extent that this  
12 interrogatory assumes facts not in evidence, specifically, that there was a request for auxiliary aids  
13 and a subsequent refusal to provide the requested auxiliary aids. Discovery and investigation are  
14 incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its  
15 response.

16 **INTERROGATORY 12e:**

17 Describe any steps you personally took in response to complaints from Plaintiffs regarding  
18 the denial of housing opportunities.

19 **RESPONSE TO INTERROGATORY 12e:**

20 Responding Party incorporates its Preliminary Statement and General Objections as though  
21 fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as  
22 to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the  
23 discovery of admissible evidence. Discovery and investigation are incomplete and ongoing.  
24 Responding Party reserves the right to supplement and/or amend its response.

25 **INTERROGATORY 12f:**

26 Describe any steps you directed others to take in response to complaints from Plaintiffs  
27 regarding the denial of housing opportunities.

28 //

**RESPONSE TO INTERROGATORY 12f:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 13:**

Identify all requests made by Plaintiffs for effective communication formats (such as email correspondence, real-time transcription, captioning, or written confirmation of verbal notices), and state whether each request was granted or denied.

**RESPONSE TO INTERROGATORY NO. 13:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “effective” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Discovery and investigation are incomplete and ongoing. Responding Party reserves the right to supplement and/or amend its response.

**INTERROGATORY NO. 14:**

Describe SHRA’s process for logging, tracking, and reviewing complaints of disability-based discrimination or failure to accommodate, including who has access to that tracking system and how those complaints are escalated.

**RESPONSE TO INTERROGATORY NO. 14:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as three separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatories 14a through 14c for clarity.

**INTERROGATORY 14a:**

Describe SHRA's process for logging, tracking, and reviewing complaints of disability-based discrimination or failure to accommodate.

**RESPONSE TO INTERROGATORY 14a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 14b:**

Identify who has access to SHRA's tracking system for logging, tracking, and reviewing complaints of disability-based discrimination or failure to accommodate.

**RESPONSE TO INTERROGATORY 14b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 14c:**

Describe how disability-based discrimination or failure to accommodate complaints are escalated.

**RESPONSE TO INTERROGATORY 14c:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds

1 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
2 to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous,  
3 unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

4 **INTERROGATORY NO. 15:**

5 State whether you have reviewed HUD guidance documents including PIH 2010-26, PIH  
6 2012-31, or the SHRA 2020 Voluntary Compliance Agreement, and describe how SHRA has  
7 implemented or failed to implement the required reforms.

8 **RESPONSE TO INTERROGATORY NO. 15:**

9 Responding Party incorporates its Preliminary Statement and General Objections as though  
10 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
11 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
12 to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous,  
13 unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.  
14 Responding Party further objects to this interrogatory to the extent that it is compound. Responding  
15 Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure,  
16 Rule 33(a)(1), and identify the separate Interrogatories as Interrogatories 15a through 15b for  
17 clarity.

18 **INTERROGATORY NO. 15a:**

19 State whether you have reviewed HUD guidance documents including PIH 2010-26, PIH  
20 2012-31, or the SHRA 2020 Voluntary Compliance Agreement.

21 **RESPONSE TO INTERROGATORY NO. 15a:**

22 Responding Party incorporates its Preliminary Statement and General Objections as though  
23 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
24 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
25 to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous,  
26 unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

27 **INTERROGATORY NO. 15b:**


28 Describe how SHRA has implemented or failed to implement the required reforms.

**RESPONSE TO INTERROGATORY NO. 15b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT MARYLIZ PAULSON'S RESPONSES TO PLAINTIFFS'  
INTERROGATORIES, SET TWO**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Geraldine Touseon

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 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT SACRAMENTO  
 HOUSING AND REDEVELOPMENT  
 AGENCY'S RESPONSES TO PLAINTIFFS'  
 REQUEST FOR PRODUCTION OF  
 DOCUMENTS, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY

SET NO.: One (1)

//



1 Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, by and  
2 through its attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby provides  
3 its Responses to Requests for Production, Set One, propounded by Plaintiffs, SYDNEY BROOKE  
4 ROBERTS and DAVID TYRONE SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not yet completed its investigation of the facts relating to this action,  
7 has not yet completed its discovery in this action, and has not yet completed its preparation for trial.  
8 All of the responses contained herein are based only upon such information and documents which  
9 are presently available to it. It is anticipated that further discovery, independent investigations, legal  
10 research and analysis will supply additional facts, add meaning to known facts, as well as establish  
11 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions,  
12 changes and variations from the contentions and responses set forth herein. The following responses  
13 are given without prejudice to Responding Party's right to produce evidence of any subsequently  
14 discovered fact or facts which Responding Party may later develop or recall. The responses  
15 contained herein were prepared with the assistance of counsel and are made in a good faith effort to  
16 supply as much factual information as is presently known, but should in no way be to the prejudice  
17 of Responding Party in relation to further discovery, research, analysis or production of evidence.

18 Furthermore, to the extent that the documents produced include personally identifiable  
19 information of third parties, this information will be redacted accordingly.

20 **GENERAL OBJECTIONS AND RESERVATIONS**

21 Each response and objection provided by responding party in response to propounding  
22 party's discovery requests herein is subject to the following General Objections and Reservations,  
23 which are incorporated into each of the responses set forth hereinafter:

24 1. Responding Party objects to Propounding Party's discovery requests to the extent  
25 they call for information which is protected from disclosure by the attorney-client privilege, the  
26 attorney work product doctrine, and/or other applicable privileges, including documents prepared  
27 in anticipation of litigation. Such information will not be provided.

28 2. Responding Party objects to Propounding Party's discovery requests to the extent

1 they call for responses containing privileged, proprietary and/or confidential business information  
2 or trade secrets. Such information will not be provided.

3 3. Responding Party objects to Propounding Party's discovery requests to the extent  
4 they call for responses or information violative of any constitutional, statutory or common law  
5 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
6 other persons. Such information will not be provided.

7 4. Responding Party objects to Propounding Party's discovery requests on the bases  
8 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

9 5. Responding Party objects to Propounding Party's discovery requests to the extent  
10 they seek information or documents already in the possession, custody or control of Propounding  
11 Party, or are as easily accessible to Propounding Party as to Responding Party.

12 6. Responding Party objects to Propounding Party's discovery requests on the basis  
13 that they are violative of Federal Rules of Civil Procedure, Rule 34.

14 7. As used herein, all objections as to relevancy shall mean that the information  
15 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
16 to lead to the discovery of admissible evidence.

17 8. Nothing herein shall be construed as an admission by responding party as respects  
18 the admissibility or relevance of any fact or document.

19 9. Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the right  
20 to amend, supplement, or otherwise modify these disclosures should different, contrary, or additional  
21 information become available.

22 This preliminary statement and general objections are incorporated into each of the responses  
23 set forth below:

24 **RESPONSES TO REQUESTS FOR PRODUCTION**

25 **REQUEST FOR PRODUCTION NO. 1:**

26 All documents related to Plaintiffs' request for a reasonable accommodation, including but  
27 not limited to applications, internal correspondence, approval/denial letters, case notes, and any  
28 supporting documentation.

**RESPONSE TO REQUEST NO. 1:**

Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 2:**

All communications (emails, letters, text messages, or memos) between SHRA employees, agents, or representatives concerning Plaintiff's reasonable accommodation request.

**RESPONSE TO REQUEST NO. 2:**

Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 3:**

Any and all internal policies, manuals, or training materials regarding the process for reviewing and deciding reasonable accommodation requests from 2019 to present.

**RESPONSE TO REQUEST NO. 3:**

Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 4:**

All logs, databases, or records of reasonable accommodation requests received by SHRA from 2019 to the present, including whether the request was granted or denied.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this request to the extent it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this request to the extent it is vague, overbroad, ambiguous, and unintelligible as to the term "logs." Responding Party further objects to this request to the extent it is burdensome and unfeasible to compile based on the magnitude of the request as the number of families supported on subsidies are in the thousands. Accordingly, Responding Party will limit this request to those documents regarding

1 and relating to Plaintiffs from 2019 to the present. Without waiving said objections, Responding  
2 Party responds as follows: Responding Party will comply with this Request and produce documents  
3 responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of  
4 Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May  
5 30, 2025.

6 **REQUEST FOR PRODUCTION NO. 5:**

7 All notices, letters, or emails sent to Plaintiffs regarding the scheduling or cancellation of  
8 their informal hearings.

9 **RESPONSE TO REQUEST NO. 5:**

10 Responding Party will comply with this Request and produce documents responsive to this  
11 Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure,  
12 Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

13 **REQUEST FOR PRODUCTION NO. 6:**

14 All internal communications (emails, meeting notes, or memos) among SHRA employees  
15 regarding the scheduling, postponement, or cancellation of Plaintiffs' informal hearings.

16 **RESPONSE TO REQUEST NO. 6:**

17 Responding Party will comply with this Request and produce documents responsive to this  
18 Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure,  
19 Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

20 **REQUEST FOR PRODUCTION NO. 7:**

21 All written policies or procedures regarding SHRA's obligation to provide an informal  
22 hearing after denying a reasonable accommodation request.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request to the extent that it is overbroad as to time and scope.  
25 Without waiving said objection, Responding Party responds as follows: Responding Party will  
26 comply with this Request and produce documents responsive to this Request that are in its  
27 possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B),  
28 Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 8:**

Any and all training materials provided to SHRA employees regarding compliance with 24 CFR § 982.555 and the process for conducting informal hearings.

**RESPONSE TO REQUEST NO. 8:**

Responding Party objects to this request to the extent that it is overbroad as to time and scope. Without waiving said objection, Responding Party responds as follows: Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 9:**

All documents, recordings, or transcripts from Plaintiffs' scheduled hearings, including records of when and why the hearings were cancelled.

**RESPONSE TO REQUEST NO. 9:**

Responding Party objects to this request to the extent that it assumes facts not in evidence. Without waiving said objection, Responding Party responds as follows: Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 10:**

Any internal reports, audits, or assessments conducted by SHRA regarding compliance with HUD-mandated hearing procedures.

**RESPONSE TO REQUEST NO. 10:**

Responding Party objects to this request to the extent it is overbroad as to time and scope, vague and ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows on information and belief: Responding conducted a diligent search and reasonable inquiry but is unable to comply with this Request because no responsive documents are in Responding Party's possession.

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**REQUEST FOR PRODUCTION NO. 11:**

All records of other informal hearings SHRA scheduled and later cancelled from 2019 to the present, including the reason for cancellation.

**RESPONSE TO REQUEST NO. 11:**

Responding Party objects to this request to the extent it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects that this request is so vague, ambiguous, overbroad, and unintelligible, requiring Responding Party to speculate what documents are sought and renders the compliance unfeasible. To the extent that Propounding Party seeks documents pertaining to Plaintiff's informal hearings, Responding Party objects to the request as duplicative of Request for Production No. 6. Without waiving said objections, Responding Party responds as follows: As it pertains to documents relating to Plaintiff's informal hearings, Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 12:**

All complaints, grievances, or lawsuits filed against SHRA in the past five years alleging failure to provide an informal hearing.

**RESPONSE TO REQUEST NO. 12:**

Responding Party objects to this request to the extent it is overbroad, vague and ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows on information and belief: Responding Party conducted a diligent search and reasonable inquiry but is unable to comply with this Request because no responsive documents are in Responding Party's possession.

**REQUEST FOR PRODUCTION NO. 13:**

Any investigations, audits, or findings from HUD, DOJ, or other agencies regarding SHRA's compliance with fair housing and due process requirements.

//

**RESPONSE TO REQUEST NO. 13:**

Responding Party objects to this request to the extent that it is unduly burdensome as it is overbroad as to time and scope. Accordingly, Responding Party will limit the time and scope of this request to within the last five years. Without waiving said objection, Responding Party responds as follows: Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 14:**

Any internal or external communications related to policy changes, training, or remedial action SHRA has taken as a result of previous hearing-related complaints or investigations.

**RESPONSE TO REQUEST NO. 14:**

Responding Party objects to this request to the extent it is overbroad as to time and scope, vague and ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows on information and belief: Responding Party is unable to comply with this Request because no such documents exist to Responding Party's knowledge.

**REQUEST FOR PRODUCTION NO. 15:**

All policies and procedures governing how SHRA notifies tenants of their right to request an informal hearing.

**RESPONSE TO REQUEST NO. 15:**

Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 16:**

All versions of forms, notices, or written guidance given to tenants regarding their hearing rights and deadlines.

**RESPONSE TO REQUEST NO. 16:**

Responding Party objects that this Request is vague and ambiguous, overbroad as to time

1 and scope, unduly burdensome, unintelligible, and violates third party's rights to privacy. As  
2 previously stated, the number of tenants in the program are in the thousands therefore it is unfeasible  
3 to provide every single form, notice, or written guidance provided to each individual tenant. Without  
4 waiving these objections, Responding Party responds as follows: Responding Party believes that this  
5 Request is seeking the template forms, notices, or written guidance given to tenants with language  
6 informing of their hearing rights and deadlines, and not the actual forms, notices, or written guidance  
7 have been transmitted to each individual tenant. Accordingly, to the extent that Responding Party  
8 understands this request, Responding Party will comply with this Request and produce documents  
9 responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of  
10 Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May  
11 30, 2025.

12 **REQUEST FOR PRODUCTION NO. 17:**

13 All communications between SHRA and HUD or other housing agencies regarding required  
14 procedures for informal hearings.

15 **RESPONSE TO REQUEST NO. 17:**

16 Responding Party objects to this request to the extent it is overbroad as to time and scope,  
17 vague and ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of  
18 admissible evidence. Without waiving said objections, Responding Party responds as follows on  
19 information and belief: Responding Party is unable to comply with this Request because no such  
20 documents exist to Responding Party's knowledge.

21 **REQUEST FOR PRODUCTION NO. 18:**

22 All documents identifying the members of SHRA's Reasonable Accommodation Committee  
23 or Reasonable Accommodation Compliance Committee, including their names, job titles, roles, and  
24 tenure.

25 **RESPONSE TO REQUEST NO. 18:**

26 Responding Party will comply with this Request and produce documents responsive to this  
27 Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure,  
28 Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.



**REQUEST FOR PRODUCTION NO. 19:**

All meeting agendas, notes, minutes, or schedules showing how often the Reasonable Accommodation Committee meets, including dates of meetings from 2019 to the present.

**RESPONSE TO REQUEST NO. 19:**

Responding Party objects to this request to the extent it is overbroad, vague and ambiguous, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows on information and belief: Responding Party is unable to comply with this Request because no such documents exist to Responding Party's knowledge.

**REQUEST FOR PRODUCTION NO. 20:**

All documents reviewed, referenced, or discussed by the Reasonable Accommodation Committee in evaluating reasonable accommodation requests, including evaluation criteria, checklists, or policy references.

**RESPONSE TO REQUEST NO. 20:**

Responding Party objects that this Request is vague and ambiguous, overbroad as to time and scope, unduly burdensome, unintelligible, and violates third party's rights to privacy. As previously stated, the number of tenants in the program are in the thousands therefore it is unfeasible to comply with this request as written. Accordingly, Responding Party will limit this request to those documents regarding and relating to Plaintiffs from 2019 to the present. Without waiving these objections, Responding Party responds as follows: Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 21:**

All internal policies, procedures, or guidelines governing the operations, purpose, and authority of the Reasonable Accommodation Committee.

**RESPONSE TO REQUEST NO. 21:**

Responding Party objects to this request to the extent that it is unduly burdensome as it is

1 overbroad as to time and scope. Accordingly, Responding Party will limit the time and scope of this  
2 request to within the last five years. Without waiving said objection, Responding Party responds as  
3 follows: Responding Party will comply with this Request and produce documents responsive to this  
4 Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure,  
5 Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

6 **REQUEST FOR PRODUCTION NO. 22:**

7 All incoming and outgoing call logs, messages, or call recordings related to SHRA's  
8 designated reasonable accommodation telephone number from 2020 to the present.

9 **RESPONSE TO REQUEST NO. 22:**

10 Responding Party objects to this request to the extent it is overbroad, vague and ambiguous,  
11 unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible  
12 evidence. Without waiving said objections, Responding Party responds as follows: Responding  
13 conducted a diligent search and reasonable inquiry but is unable to comply with this Request because  
14 no responsive documents are in Responding Party's possession.

15 **REQUEST FOR PRODUCTION NO. 23:**

16 All documents related to the recruitment, retention, appointment, or contracting of informal  
17 hearing officers used by SHRA from 2019 to the present.

18 **RESPONSE TO REQUEST NO. 23:**

19 Responding Party objects to this request to the extent it is overbroad as to scope, vague and  
20 ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence.  
21 Furthermore, Responding Party objects that this request is unduly burdensome and irrelevant. In  
22 order to comply with this request, Responding Party limits the scope of the request to documents  
23 related to the recruitment, retention, appointment, or contracting of informal hearing officers  
24 assigned to Plaintiffs' informal hearings. Without waiving said objections, Responding Party  
25 responds as follows: Responding Party will comply with this Request and produce documents  
26 responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of  
27 Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May  
28 30, 2025.

**REQUEST FOR PRODUCTION NO. 24:**

A list including the names, titles, and contact information for all individuals who have served as informal hearing officers for SHRA in the last five years.

**RESPONSE TO REQUEST NO. 24:**

Responding Party objects to this request to the extent it is overbroad as to scope and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Responding Party objects that this request is vague and ambiguous as it seeks a “list” as no document exists. Responding conducted a diligent search and reasonable inquiry but is unable to comply with this Request because no responsive documents are in Responding Party’s possession.

**REQUEST FOR PRODUCTION NO. 25:**

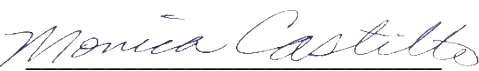
All communications, including emails or memos, between or among SHRA employees and informal hearing officers regarding Plaintiffs’ informal hearings.

**RESPONSE TO REQUEST NO. 25:**

Responding Party will comply with this Request and produce documents responsive to this Request that are in its possession, custody, or control. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By: 

EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS, SET  
ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touseon

**SERVICE LIST**

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 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT IBRA HENLEY'S  
 RESPONSES TO PLAINTIFF'S REQUEST  
 FOR ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, IBRA HENLEY

SET NO.: One (1)

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Defendant, IBRA HENLY, by and through its attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby provides their Responses to Requests for Admissions, Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL, as follows:

**PRELIMINARY STATEMENT**

Responding Party has not completed his investigation or discovery in this action. This response is based on Responding Party's knowledge, information and belief at this time, and is complete to the best of his present knowledge and understanding. Responding Party reserves the right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of trial any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this response. Responding Party assumes no obligation to voluntarily supplement or amend this response to reflect facts, evidence, or other information discovered following service of this response. Nevertheless, this response is given without prejudice to subsequent revision or supplementation based upon facts, evidence, and other information, which hereafter may be discovered.

**GENERAL OBJECTIONS**

The following General Objections are applicable to and incorporated into each response. The assertion of the same, similar, or additional objections in any specific response does not waive Responding Party's general objections as set forth below:

1. Responding Party objects to the following Requests for Admission to the extent that any of them seek information protected from disclosure by the attorney-client privilege, the work product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection. Responding Party intends to and does claim privilege with respect to all such information and declines to provide any such information. Any inadvertent disclosure of privileged or protected information is not intended to be, and should not be deemed, a waiver of any privilege or protection from disclosure.

2. Responding Party objects to the following Requests for Admissions to the extent that they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil Procedure.

1           3.       Responding Party objects to the following Requests for Admissions to the extent that  
2 they seek confidential information and/or private information of third parties. Such information will  
3 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
4 consent of such third parties.

5           4.       Responding Party objects to the following Requests for Admissions to the extent that  
6 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

7           5.       Responding Party objects to the following Requests for Admissions to the extent that  
8 they seek information outside the possession, control, or custody of Responding Party.

9           6.       Responding Party objects to the following Requests for Admissions to the extent that  
10 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
11 to lead to the discovery of admissible evidence.

12          7.       Responding Party objects to the following Requests for Admissions to the extent that  
13 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
14 and information that are equally available to Propounding Party, publicly available, and/or that are  
15 more properly and more readily obtained from third parties.

16          8.       Responding Party objects to the following Requests for Admissions to the extent that  
17 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
18 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
19 evidence.

20          9.       Responding Party objects to the following Requests for Admissions as premature as  
21 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
22 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

23          10.       Information provided in response to the Requests for Admissions are provided  
24 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
25 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
26 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
27 use of such information, or the subject matter thereof, on any ground in any further proceeding in  
28 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
or Requests for further responses to these Requests for Admissions or any other Requests or other



1 discovery proceedings.

2 11. The Specific Responses below are based upon information reasonably available to  
3 Responding Party as of the date of this Response, after having made a diligent search. Responding  
4 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
5 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
6 without prejudice to Responding Party's right to present at trial, or in support or opposition of any  
7 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
8 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
9 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
10 documents it provides in response to these Requests.

11 The foregoing General Objections are incorporated into the responses of each of the Requests  
12 for Admissions below as though set forth fully therein.

13 **RESPONSES TO REQUESTS FOR ADMISSION**

14 **REQUEST FOR ADMISSION NO. 1:**

15 Admit that you are responsible for coordinating or administering informal hearings for  
16 Housing Choice Voucher participants at SHRA.

17 **RESPONSE TO REQUEST NO. 1:**

18 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
19 Without waiving said objection, Responding Party is not able to admit or deny Request for  
20 Admission No. 1 for the following reasons: Responding Party, although defended through  
21 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
22 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
23 additional time to contact Responding Party, its former employee, in order to obtain information  
24 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
25 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
26 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
27 concerning the matter and the information known or readily availability is insufficient to enable that  
28 party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 2:**

Admit that you personally reviewed or responded to at least one reasonable accommodation request submitted by Plaintiffs.

**RESPONSE TO REQUEST NO. 2:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 2 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 3:**

Admit that you are not a licensed medical professional or social worker.

**RESPONSE TO REQUEST NO. 3:**

Responding Party is not able to admit or deny Request for Admission No. 3 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

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**REQUEST FOR ADMISSION NO. 4:**

Admit that you have questioned the validity of Plaintiffs' disability or need for accommodation during SHRA's internal discussions.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 4 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 5:**

Admit that SHRA has not issued a written decision following one or more informal hearings or hearing requests submitted by Plaintiffs.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 5 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

1 concerning the matter and the information known or readily availability is insufficient to enable that  
2 party to admit or deny the matter.

3 **REQUEST FOR ADMISSION NO. 6:**

4 Admit that you did not provide Plaintiffs with advance access to their case file before one or  
5 more informal hearings.

6 **RESPONSE TO REQUEST NO. 6:**

7 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
8 Without waiving said objection, Responding Party is not able to admit or deny Request for  
9 Admission No. 6 for the following reasons: Responding Party, although defended through  
10 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
11 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
12 additional time to contact Responding Party, its former employee, in order to obtain information  
13 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
14 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
15 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
16 concerning the matter and the information known or readily availability is insufficient to enable that  
17 party to admit or deny the matter.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that you have previously made or been reported for making statements suggesting that  
20 voucher participants exaggerate or fabricate disability claims to obtain benefits.

21 **RESPONSE TO REQUEST NO. 7:**

22 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
23 Without waiving said objection, Responding Party is not able to admit or deny Request for  
24 Admission No. 7 for the following reasons: Responding Party, although defended through  
25 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
26 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
27 additional time to contact Responding Party, its former employee, in order to obtain information  
28 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
faith efforts to contact Responding Party and will supplement the herein Responses once it is able

1 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
2 concerning the matter and the information known or readily availability is insufficient to enable that  
3 party to admit or deny the matter.

4 **REQUEST FOR ADMISSION NO. 8:**

5 Admit that you did not take steps to ensure that Plaintiffs' communication accommodation  
6 requests were implemented prior to a hearing or adverse action.

7 **RESPONSE TO REQUEST NO. 8:**

8 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
9 Without waiving said objection, Responding Party is not able to admit or deny Request for  
10 Admission No. 8 for the following reasons: Responding Party, although defended through  
11 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
12 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
13 additional time to contact Responding Party, its former employee, in order to obtain information  
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16 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
17 concerning the matter and the information known or readily availability is insufficient to enable that  
18 party to admit or deny the matter.

19 **REQUEST FOR ADMISSION NO. 9:**

20 Admit that SHRA did not consistently evaluate Plaintiffs' accommodation requests based on  
21 individualized assessment or HUD guidance.

22 **RESPONSE TO REQUEST NO. 9:**

23 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
24 Without waiving said objection, Responding Party is not able to admit or deny Request for  
25 Admission No. 9 for the following reasons: Responding Party, although defended through  
26 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
27 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
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 3 concerning the matter and the information known or readily availability is insufficient to enable that  
 4 party to admit or deny the matter.

5 **REQUEST FOR ADMISSION NO. 10:**

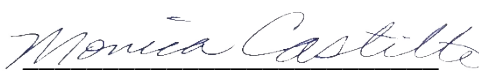
6 Admit that you acted on behalf of SHRA in a manner intended to advocate for denial of  
 7 Plaintiffs' requested accommodation.

8 **RESPONSE TO REQUEST NO. 10:**

9 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 10 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 11 Admission No. 10 for the following reasons: Responding Party, although defended through  
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 19 party to admit or deny the matter.

20  
 21 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
 EDELMAN & DICKER LLP**

22 By:   
 23 EDWARD P. GARSON  
 24 MONICA C. CASTILLO  
 25 CHANDNI B. MISTRY  
 26 Attorneys for Defendants  
 27  
 28

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT IBRA HENLY'S RESPONSES TO PLAINTIFFS' REQUEST FOR  
 ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT IBRA HENLEY'S  
 RESPONSES TO PLAINTIFF'S REQUEST  
 FOR ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, IBRA HENLEY

SET NO.: One (1)

//

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Defendant, IBRA HENLY, by and through its attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby provides their Responses to Requests for Admissions, Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL, as follows:

**PRELIMINARY STATEMENT**

Responding Party has not completed his investigation or discovery in this action. This response is based on Responding Party's knowledge, information and belief at this time, and is complete to the best of his present knowledge and understanding. Responding Party reserves the right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of trial any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this response. Responding Party assumes no obligation to voluntarily supplement or amend this response to reflect facts, evidence, or other information discovered following service of this response. Nevertheless, this response is given without prejudice to subsequent revision or supplementation based upon facts, evidence, and other information, which hereafter may be discovered.

**GENERAL OBJECTIONS**

The following General Objections are applicable to and incorporated into each response. The assertion of the same, similar, or additional objections in any specific response does not waive Responding Party's general objections as set forth below:

1. Responding Party objects to the following Requests for Admission to the extent that any of them seek information protected from disclosure by the attorney-client privilege, the work product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection. Responding Party intends to and does claim privilege with respect to all such information and declines to provide any such information. Any inadvertent disclosure of privileged or protected information is not intended to be, and should not be deemed, a waiver of any privilege or protection from disclosure.

2. Responding Party objects to the following Requests for Admissions to the extent that they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil Procedure.

1           3.       Responding Party objects to the following Requests for Admissions to the extent that  
2 they seek confidential information and/or private information of third parties. Such information will  
3 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
4 consent of such third parties.

5           4.       Responding Party objects to the following Requests for Admissions to the extent that  
6 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

7           5.       Responding Party objects to the following Requests for Admissions to the extent that  
8 they seek information outside the possession, control, or custody of Responding Party.

9           6.       Responding Party objects to the following Requests for Admissions to the extent that  
10 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
11 to lead to the discovery of admissible evidence.

12          7.       Responding Party objects to the following Requests for Admissions to the extent that  
13 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
14 and information that are equally available to Propounding Party, publicly available, and/or that are  
15 more properly and more readily obtained from third parties.

16          8.       Responding Party objects to the following Requests for Admissions to the extent that  
17 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
18 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
19 evidence.

20          9.       Responding Party objects to the following Requests for Admissions as premature as  
21 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
22 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

23          10.       Information provided in response to the Requests for Admissions are provided  
24 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
25 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
26 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
27 use of such information, or the subject matter thereof, on any ground in any further proceeding in  
28 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
or Requests for further responses to these Requests for Admissions or any other Requests or other

1 discovery proceedings.

2 11. The Specific Responses below are based upon information reasonably available to  
 3 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 4 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 5 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 6 without prejudice to Responding Party's right to present at trial, or in support or opposition of any  
 7 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 8 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 9 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 10 documents it provides in response to these Requests.

11 The foregoing General Objections are incorporated into the responses of each of the Requests  
 12 for Admissions below as though set forth fully therein.

### 13 **RESPONSES TO REQUESTS FOR ADMISSION**

#### 14 **REQUEST FOR ADMISSION NO. 1:**

15 Admit that you are responsible for coordinating or administering informal hearings for  
 16 Housing Choice Voucher participants at SHRA.

#### 17 **RESPONSE TO REQUEST NO. 1:**

18 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 19 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 20 Admission No. 1 for the following reasons: Responding Party, although defended through  
 21 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 22 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
 23 additional time to contact Responding Party, its former employee, in order to obtain information  
 24 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 25 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 26 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
 27 concerning the matter and the information known or readily availability is insufficient to enable that  
 28 party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 2:**

Admit that you personally reviewed or responded to at least one reasonable accommodation request submitted by Plaintiffs.

**RESPONSE TO REQUEST NO. 2:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 2 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 3:**

Admit that you are not a licensed medical professional or social worker.

**RESPONSE TO REQUEST NO. 3:**

Responding Party is not able to admit or deny Request for Admission No. 3 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

//

**REQUEST FOR ADMISSION NO. 4:**

Admit that you have questioned the validity of Plaintiffs' disability or need for accommodation during SHRA's internal discussions.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 4 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 5:**

Admit that SHRA has not issued a written decision following one or more informal hearings or hearing requests submitted by Plaintiffs.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 5 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

1 concerning the matter and the information known or readily availability is insufficient to enable that  
2 party to admit or deny the matter.

3 **REQUEST FOR ADMISSION NO. 6:**

4 Admit that you did not provide Plaintiffs with advance access to their case file before one or  
5 more informal hearings.

6 **RESPONSE TO REQUEST NO. 6:**

7 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
8 Without waiving said objection, Responding Party is not able to admit or deny Request for  
9 Admission No. 6 for the following reasons: Responding Party, although defended through  
10 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
11 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
12 additional time to contact Responding Party, its former employee, in order to obtain information  
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15 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
16 concerning the matter and the information known or readily availability is insufficient to enable that  
17 party to admit or deny the matter.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that you have previously made or been reported for making statements suggesting that  
20 voucher participants exaggerate or fabricate disability claims to obtain benefits.

21 **RESPONSE TO REQUEST NO. 7:**

22 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
23 Without waiving said objection, Responding Party is not able to admit or deny Request for  
24 Admission No. 7 for the following reasons: Responding Party, although defended through  
25 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
26 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
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1 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
2 concerning the matter and the information known or readily availability is insufficient to enable that  
3 party to admit or deny the matter.

4 **REQUEST FOR ADMISSION NO. 8:**

5 Admit that you did not take steps to ensure that Plaintiffs' communication accommodation  
6 requests were implemented prior to a hearing or adverse action.

7 **RESPONSE TO REQUEST NO. 8:**

8 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
9 Without waiving said objection, Responding Party is not able to admit or deny Request for  
10 Admission No. 8 for the following reasons: Responding Party, although defended through  
11 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
12 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
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18 party to admit or deny the matter.

19 **REQUEST FOR ADMISSION NO. 9:**

20 Admit that SHRA did not consistently evaluate Plaintiffs' accommodation requests based on  
21 individualized assessment or HUD guidance.

22 **RESPONSE TO REQUEST NO. 9:**

23 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
24 Without waiving said objection, Responding Party is not able to admit or deny Request for  
25 Admission No. 9 for the following reasons: Responding Party, although defended through  
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1 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
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 4 party to admit or deny the matter.

5 **REQUEST FOR ADMISSION NO. 10:**

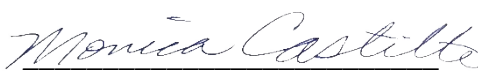
6 Admit that you acted on behalf of SHRA in a manner intended to advocate for denial of  
 7 Plaintiffs' requested accommodation.

8 **RESPONSE TO REQUEST NO. 10:**

9 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 10 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 11 Admission No. 10 for the following reasons: Responding Party, although defended through  
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 19 party to admit or deny the matter.

20  
 21 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
 EDELMAN & DICKER LLP**

22 By:   
 23 EDWARD P. GARSON  
 24 MONICA C. CASTILLO  
 25 CHANDNI B. MISTRY  
 26 Attorneys for Defendants  
 27  
 28

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT IBRA HENLY'S RESPONSES TO PLAINTIFFS' REQUEST FOR  
 ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

Geraldine Touson

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 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT IBRA HENLY'S RESPONSES  
 TO PLAINTIFFS' INTERROGATORIES,  
 SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, IBRA HENLY

SET NO.: One (1)

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1 Defendant, IBRA HENLY, (hereinafter referred to as “Defendant” or “Responding Party”),  
2 by and through their attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby  
3 responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your current job title and describe your responsibilities at SHRA, including your role in the informal hearing process and in the review, analysis, or recommendation of reasonable accommodation requests.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 2:**

State all job titles you have held within SHRA since 2018, the dates of each position, and your responsibilities with respect to Housing Choice Voucher (HCV) hearings or accommodations for persons with disabilities.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding employment information from over seven years ago that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

//

**INTERROGATORY NO. 3:**

Describe your role in coordinating, scheduling, or participating in any informal hearing requested by Plaintiffs between 2022 and 2024.

**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 4:**

Identify all reasonable accommodation requests submitted by Plaintiffs that you reviewed, analyzed, responded to, or were copied on, including the date of the request, any communication with staff or supervisors, and your recommendations or determinations.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 5:**

State whether you have received any formal training between 2020 and 2024 regarding your responsibilities under the Fair Housing Act (FHA), Americans with Disabilities Act (ADA), Rehabilitation Act, or California civil rights statutes such as FEHA or CDPA.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not



1 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
 2 objects to the term “formal training” as it is vague, subjective, ambiguous, undefined, and subject  
 3 to multiple interpretations.

4 **INTERROGATORY NO. 6:**

5 Describe your understanding of SHRA’s obligations to provide reasonable accommodations  
 6 in its HCV program and informal hearings, and explain your role in evaluating whether an  
 7 accommodation is supported by medical or nexus documentation.

8 **RESPONSE TO INTERROGATORY NO. 6:**

9 Responding Party incorporates its Preliminary Statement and General Objections as though  
 10 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
 11 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
 12 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
 13 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
 14 objects to the term “your understanding” as it is vague, subjective, ambiguous, undefined, and  
 15 subject to multiple interpretations. Responding Party further objects to this interrogatory to the  
 16 extent that it is compound. Responding Party will treat this as two separate Interrogatories, as  
 17 provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate  
 18 Interrogatories as Interrogatory 6a and Interrogatory 6b for clarity.

19 **INTERROGATORY NO. 6a:**

20 Describe your understanding of SHRA’s obligations to provide reasonable accommodations  
 21 in its HCV program and informal hearings.

22 **RESPONSE TO INTERROGATORY NO. 6a:**

23 Responding Party incorporates its Preliminary Statement and General Objections as though  
 24 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
 25 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
 26 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
 27 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
 28 objects to the term “your understanding” as it is vague, subjective, ambiguous, undefined, and

subject to multiple interpretations.

**INTERROGATORY NO. 6b:**

Explain your role in evaluating whether an accommodation is supported by medical or nexus documentation.

**RESPONSE TO INTERROGATORY NO. 6b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “nexus documentation” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 7:**

State whether you have ever made statements, either verbally or in writing, suggesting that a voucher participant’s disability was fake, exaggerated, or unsupported, including the date and circumstances of such statements.

**RESPONSE TO INTERROGATORY NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, burdensome, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 8:**

Describe SHRA’s process for identifying and investigating staff misconduct or bias related to the handling of disability accommodations, and identify whether you have been the subject of any complaint, review, or supervisory directive related to such conduct.

//

**RESPONSE TO INTERROGATORY NO. 8:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 8a and Interrogatory 8b for clarity.

**INTERROGATORY NO. 8a:**

Describe SHRA's process for identifying and investigating staff misconduct or bias related to the handling of disability accommodations.

**RESPONSE TO INTERROGATORY NO. 8a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 8b:**

Identify whether you have been the subject of any complaint, review, or supervisory directive related to misconduct or bias related to the handling of disability accommodations.

**RESPONSE TO INTERROGATORY NO. 8b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

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**INTERROGATORY NO. 9:**

Identify all persons with whom you discussed Plaintiffs' reasonable accommodation requests, the substance of those discussions, and whether any SHRA policy or practice was cited as a reason for denying or delaying action.

**RESPONSE TO INTERROGATORY NO. 9:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 10:**

Describe how you distinguish between conducting a neutral administrative review and advocating for SHRA's interest in opposing or denying an accommodation request.

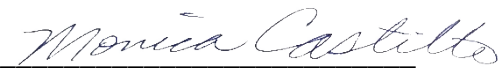
**RESPONSE TO INTERROGATORY NO. 10:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term "distinguish" as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:

  
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT IBRA HENLY'S RESPONSES TO PLAINTIFFS' INTERROGATORIES,  
 SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon

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Attorneys for Defendants SACRAMENTO  
HOUSING AND REDEVELOPMENT AGENCY,  
LA SHELLE DOZIER, MARYLIZ PAULSON,  
TORY LYNCH, TANYA CRUZ, TAMEKA  
JACKSON, LISA MACIAS, TIFFANY BROWN,  
and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT IBRA HENLY'S RESPONSES  
TO PLAINTIFFS' INTERROGATORIES,  
SET TWO**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, IBRA HENLY

SET NO.: Two (2)

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1 Defendant, IBRA HENLY, (hereinafter referred to as “Defendant” or “Responding Party”),  
2 by and through their attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby  
3 responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set Two, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared



1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 11:**

Identify all emails, text messages, internal notes, or case file entries created by you regarding Plaintiffs' informal hearing requests or reasonable accommodation requests between 2022 and 2024.

**RESPONSE TO INTERROGATORY NO. 11:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term "internal notes" as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 12:**

Describe the process by which you determine whether a participant's claimed disability or accommodation need is legitimate, including any criteria or sources of authority you rely on.

**RESPONSE TO INTERROGATORY NO. 2**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term "legitimate" as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 13:**

Identify all staff members you consulted or communicated with regarding Plaintiffs' accommodation or hearing requests, and describe the substance of each discussion.

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**RESPONSE TO INTERROGATORY NO. 13:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “consulted” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 14:**

State whether you are aware of SHRA policies or practices that limit or delay processing of accommodation requests involving multiple RFTAs, rent reasonableness exceptions, or housing requests outside designated zip codes.

**RESPONSE TO INTERROGATORY NO. 14:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “RFTAs” and “rent reasonableness exceptions” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 15:**

Describe all complaints, legal claims, or grievances you are aware of involving allegations of disability discrimination or due process violations during your tenure at SHRA, whether filed by Plaintiffs or others.

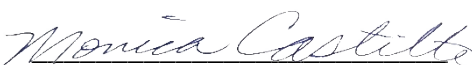
**RESPONSE TO INTERROGATORY NO. 15:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects

1 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
2 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
3 objects to this interrogatory to the extent it invade information protected by attorney-client  
4 privilege. Responding Party further objects to the term “grievances” as it is vague, subjective,  
5 ambiguous, undefined, and subject to multiple interpretations.

6  
7  
8 Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

9 By: 

10 EDWARD P. GARSON  
11 MONICA C. CASTILLO  
12 CHANDNI B. MISTRY  
13 Attorneys for Defendants  
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**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT IBRA HENLY'S RESPONSES TO PLAINTIFFS' INTERROGATORIES,  
 SET TWO**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

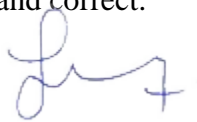
☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon

**SERVICE LIST**

Sydney Brooke Roberts  
David Tyrone Samuel  
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HOUSING AND REDEVELOPMENT AGENCY,  
LA SHELLE DOZIER, MARYLIZ PAULSON,  
TORY LYNCH, TANYA CRUZ, TAMEKA  
JACKSON, LISA MACIAS, TIFFANY BROWN,  
and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LISA MACIAS' RESPONSES  
TO PLAINTIFFS' REQUEST FOR  
ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, LISA MACIAS

SET NO.: One (1)

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1 Defendant, LISA MACIAS, by and through her attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil



1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition to any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

#### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

##### 16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that you were the SHRA point of contact for Ashley Valentine of Sacramento Self  
 18 Help Housing concerning Plaintiffs' case in or around May 2022.

##### 19 **RESPONSE TO REQUEST NO. 1:**

20 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 21 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 22 Admission No. 1 for the following reasons: Responding Party, although defended through  
 23 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 24 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
 25 additional time to contact Responding Party, its former employee, in order to obtain information  
 26 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 27 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 28 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 2:**

Admit that you received one or more voicemail messages or email communications from Ashley Valentine in May 2022.

**RESPONSE TO REQUEST NO. 2:**

Responding Party is not able to admit or deny Request for Admission No. 2 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 3:**

Admit that your voicemail inbox was full and unable to receive new messages at one or more times in May 2022.

**RESPONSE TO REQUEST NO. 3:**

Responding Party is not able to admit or deny Request for Admission No. 3 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 4:**

Admit that you did not return one or more calls or emails from Plaintiffs or their representative between April and June 2022.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 4 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 5:**

Admit that you received at least one document submission or drop box notice from Plaintiffs or their representative during that period.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 5 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 6:**

Admit that you did not send a written acknowledgment or confirmation of receipt to Plaintiffs or their representative.

**RESPONSE TO REQUEST NO. 6:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 6 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 7:**

Admit that your failure to respond contributed to delays in processing Plaintiffs' reasonable accommodation or housing paperwork in May or June 2022.

**RESPONSE TO REQUEST NO. 7:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 7 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good

1 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
2 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
3 concerning the matter and the information known or readily availability is insufficient to enable that  
4 party to admit or deny the matter.

5  
6 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

7 By: *Monica Castillo*

8 EDWARD P. GARSON  
9 MONICA C. CASTILLO  
10 CHANDNI B. MISTRY  
11 Attorneys for Defendants  
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**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LISA MACIAS' RESPONSES TO PLAINTIFFS'  
 REQUEST FOR ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

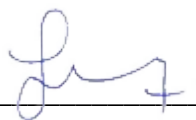
☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

**SERVICE LIST**

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 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT LISA MACIAS'S RESPONSES  
 TO PLAINTIFFS' INTERROGATORIES,  
 SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, LISA MACIAS

SET NO.: One (1)

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1 Defendant, LISA MACIAS, (hereinafter referred to as “Defendant” or “Responding Party”),  
2 by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby  
3 responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your job title and responsibilities at SHRA as of May and June 2022, including your role in processing reasonable accommodation requests or receiving documents from third-party representatives.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 2:**

Describe your interactions or communications with Ashley Valentine of Sacramento Self Help Housing (SSHH) regarding Plaintiffs’ case or any accommodation-related documentation submitted on their behalf.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 3:**

Identify any documents or materials you received or were copied on from Plaintiffs or SSHH between April 2022 and July 2022 concerning reasonable accommodation, RFTA processing, or document verification.

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**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “copied on” and “RFTA” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 4:**

State whether you were assigned to respond to any incoming calls, emails, or voicemail messages from Plaintiffs or SSHH during the period from April 1, 2022 to July 1, 2022.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 5:**

Describe SHRA’s internal procedures in place at that time for handling voicemail messages directed to housing staff, and whether you had a personal or shared voicemail system.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “that time” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to this interrogatory to the extent that it

1 is compound. Responding Party will treat this as two separate Interrogatories, as provided by  
2 Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as  
3 Interrogatory 5a and Interrogatory 5b for clarity.

4 **INTERROGATORY 5a:**

5 Describe SHRA's internal procedures in place at that time for handling voicemail messages  
6 directed to housing staff.

7 **RESPONSE TO INTERROGATORY 5a:**

8 Responding Party incorporates its Preliminary Statement and General Objections as though  
9 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
10 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
11 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
12 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
13 objects to the term "that time" as it is vague, subjective, ambiguous, undefined, and subject to  
14 multiple interpretations.

15 **INTERROGATORY 5b:**

16 Describe whether you had a personal or shared voicemail system at SHRA.

17 **RESPONSE TO INTERROGATORY 5b:**

18 Responding Party incorporates its Preliminary Statement and General Objections as though  
19 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
20 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
21 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
22 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
23 objects to the term "shared" as it is vague, subjective, ambiguous, undefined, and subject to multiple  
24 interpretations.

25 **INTERROGATORY NO. 6:**

26 Identify any complaints, technical reports, or capacity issues affecting your voicemail inbox  
27 between April and July 2022.

28 //

**RESPONSE TO INTERROGATORY NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “technical reports” and “capacity issues” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 7:**


Describe any forwarding, scanning, or routing procedures you followed for materials submitted by Plaintiffs or Ashley Valentine, including the identity of SHRA staff you forwarded documents to.

**RESPONSE TO INTERROGATORY NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT LISA MACIAS'S RESPONSES TO PLAINTIFF'S INTERROGATORIES,  
 SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon



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LA SHELLE DOZIER, MARYLIZ PAULSON,  
TORY LYNCH, TANYA CRUZ, TAMEKA  
JACKSON, LISA MACIAS, TIFFANY BROWN,  
and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT SACRAMENTO HOUSING  
AND REDEVELOPMENT AGENCY'S  
RESPONSES TO PLAINTIFFS' REQUEST  
FOR PRODUCTION, SET TWO (RE: LEAH  
SHAW)**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, LEAH SHAW

SET NO.: Two (2)

//

//

1 Defendant, SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY, by and  
2 through its attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby provides  
3 its Responses to Requests for Production, Set Two, (re: Leah Shaw) propounded by Plaintiffs,  
4 SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not yet completed its investigation of the facts relating to this action,  
7 has not yet completed its discovery in this action, and has not yet completed its preparation for trial.  
8 All of the responses contained herein are based only upon such information and documents which  
9 are presently available to it. It is anticipated that further discovery, independent investigations, legal  
10 research and analysis will supply additional facts, add meaning to known facts, as well as establish  
11 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions,  
12 changes and variations from the contentions and responses set forth herein. The following responses  
13 are given without prejudice to Responding Party's right to produce evidence of any subsequently  
14 discovered fact or facts which Responding Party may later develop or recall. The responses  
15 contained herein were prepared with the assistance of counsel and are made in a good faith effort to  
16 supply as much factual information as is presently known, but should in no way be to the prejudice  
17 of Responding Party in relation to further discovery, research, analysis or production of evidence.

18 Furthermore, to the extent that the documents produced include personally identifiable  
19 information of third parties, this information will be redacted accordingly.

20 **GENERAL OBJECTIONS AND RESERVATIONS**

21 Each response and objection provided by responding party in response to propounding  
22 party's discovery requests herein is subject to the following General Objections and Reservations,  
23 which are incorporated into each of the responses set forth hereinafter:

24 1. Responding Party objects to Propounding Party's discovery requests to the extent  
25 they call for information which is protected from disclosure by the attorney-client privilege, the  
26 attorney work product doctrine, and/or other applicable privileges, including documents prepared  
27 in anticipation of litigation. Such information will not be provided.

28 2. Responding Party objects to Propounding Party's discovery requests to the extent

1 they call for responses containing privileged, proprietary and/or confidential business information  
2 or trade secrets. Such information will not be provided.

3 3. Responding Party objects to Propounding Party's discovery requests to the extent  
4 they call for responses or information violative of any constitutional, statutory or common law  
5 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
6 other persons. Such information will not be provided.

7 4. Responding Party objects to Propounding Party's discovery requests on the bases  
8 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

9 5. Responding Party objects to Propounding Party's discovery requests to the extent  
10 they seek information or documents already in the possession, custody or control of Propounding  
11 Party, or are as easily accessible to Propounding Party as to Responding Party.

12 6. Responding Party objects to Propounding Party's discovery requests on the basis  
13 that they are violative of Federal Rules of Civil Procedure, Rule 34.

14 7. As used herein, all objections as to relevancy shall mean that the information  
15 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
16 to lead to the discovery of admissible evidence.

17 8. Nothing herein shall be construed as an admission by responding party as respects  
18 the admissibility or relevance of any fact or document.

19 9. Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the right  
20 to amend, supplement, or otherwise modify these disclosures should different, contrary, or additional  
21 information become available.

22 This preliminary statement and general objections are incorporated into each of the responses  
23 set forth below:

24 **RESPONSES TO REQUESTS FOR PRODUCTION**

25 **REQUEST FOR PRODUCTION NO. 1:**

26 All documents, emails, or internal correspondence authored by or sent to Leah Shaw from  
27 January 1, 2023 to May 30, 2023 that relate to the Arbors units, the Plaintiffs, or the denial or delay  
28 of RFTA processing.

**RESPONSE TO REQUEST NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “RFTA” as it is vague, subjective, ambiguous, and undefined. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 2:**

All internal guidelines, memoranda, job descriptions, or training materials describing Leah Shaw’s job duties as they relate to affordability determinations or RFTA approval processes.

**RESPONSE TO REQUEST NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 3:**

All emails, messages, or memos between Leah Shaw and any third-party contractor or data vendor used by SHRA for affordability analysis, from 2022 to the present.

**RESPONSE TO REQUEST NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

1 Responding Party further objects to the term “data vendor” as it is vague, subjective, ambiguous,  
2 undefined, and subject to multiple interpretations. Without waiving said objections, Responding  
3 Party responds as follows: To the extent that Responsive Party has any documents responsive to this  
4 Request that are in its possession, custody, or control, Responding Party will comply with this  
5 Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will  
6 produce said documents no later than May 30, 2025.

7 **REQUEST FOR PRODUCTION NO. 4:**

8 All contracts, memoranda of understanding (MOUs), or service agreements with third-party  
9 vendors, contractors, or data providers used by SHRA for affordability or rent reasonableness  
10 analysis from 2020 to the present.

11 **RESPONSE TO REQUEST NO. 4:**

12 Responding Party incorporates its Preliminary Statement and General Objections as though  
13 fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time  
14 and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.  
15 Responding Party further objects to the term “data vendors” as it is vague, subjective, ambiguous,  
16 undefined, and subject to multiple interpretations. Without waiving said objections, Responding  
17 Party responds as follows: To the extent that Responsive Party has any documents responsive to this  
18 Request that are in its possession, custody, or control, Responding Party will comply with this  
19 Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will  
20 produce said documents no later than May 30, 2025.

21 **REQUEST FOR PRODUCTION NO. 5:**

22 All documents explaining or defining how long an affordability determination is expected to  
23 take under SHRA’s current policies, including any internal performance benchmarks.

24 **RESPONSE TO REQUEST NO. 5:**

25 Responding Party incorporates its Preliminary Statement and General Objections as though  
26 fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time  
27 and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.  
28 Responding Party further objects to the term “internal performance benchmarks” as it is vague,

subjective, ambiguous, undefined, and subject to multiple interpretations. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 6:**

Any logs, reports, or tracking data showing how long it took to complete affordability analysis for the Arbors units in Plaintiffs' case, including date of submission, date of analysis, and date of final decision or rejection.

**RESPONSE TO REQUEST NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms "logs" and "tracking data" as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 7:**

All communications between Leah Shaw and members of SHRA's Reasonable Accommodation Committee that refer to the Plaintiffs, their disability status, or affordability exceptions between January 1, 2022 and December 31, 2024.

**RESPONSE TO REQUEST NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that

Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 8:**

All policies or procedures explaining whether and how SHRA staff may override, delay, or reopen affordability determinations made using third-party data tools.

**RESPONSE TO REQUEST NO. 8:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “third-party data tools” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025

**REQUEST FOR PRODUCTION NO. 9:**

Any documents that describe when or why an affordability determination might be delayed more than 14 days, including explanations related to software, manual review, or supervisory intervention.

**RESPONSE TO REQUEST NO. 9:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “manual review” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this



Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 10:**


All drafts, notes, or internal comments prepared by Leah Shaw regarding the Plaintiffs' RFTA submissions, including any versions not provided to the Plaintiffs.

**RESPONSE TO REQUEST NO. 10:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term "RFTA" as it is vague, subjective, ambiguous, and undefined. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY'S  
 RESPONSES TO PLAINTIFFS'  
 REQUEST FOR PRODUCTION OF DOCUMENTS, SET TWO (RE: LEAH SHAW)**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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and IBRA HENLEY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TAMEKA JACKSON'S  
RESPONSES TO PLAINTIFFS' REQUEST  
FOR PRODUCTION OF DOCUMENTS, SET  
ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
TYRONE SAMUEL

RESPONDING PARTY: Defendant, TAMEKA JACKSON

SET NO.: One (1)

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Defendant, TAMEKA JACKSON, by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Production of Documents, Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL, as follows:

**PRELIMINARY STATEMENT**

Responding Party has not yet completed its investigation of the facts relating to this action, has not yet completed its discovery in this action, and has not yet completed its preparation for trial. All of the responses contained herein are based only upon such information and documents which are presently available to it. It is anticipated that further discovery, independent investigations, legal research and analysis will supply additional facts, add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions, changes and variations from the contentions and responses set forth herein. The following responses are given without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact or facts which Responding Party may later develop or recall. The responses contained herein were prepared with the assistance of counsel and are made in a good faith effort to supply as much factual information as is presently known, but should in no way be to the prejudice of Responding Party in relation to further discovery, research, analysis or production of evidence.

Furthermore, to the extent that the documents produced include personally identifiable information of third parties, this information will be redacted accordingly.

**GENERAL OBJECTIONS AND RESERVATIONS**

Each response and objection provided by responding party in response to propounding party's discovery requests herein is subject to the following General Objections and Reservations, which are incorporated into each of the responses set forth hereinafter:

1. Responding Party objects to Propounding Party's discovery requests to the extent they call for information which is protected from disclosure by the attorney-client privilege, the attorney work product doctrine, and/or other applicable privileges, including documents prepared in anticipation of litigation. Such information will not be provided.

2. Responding Party objects to Propounding Party's discovery requests to the extent

1 they call for responses containing privileged, proprietary and/or confidential business information  
2 or trade secrets. Such information will not be provided.

3 3. Responding Party objects to Propounding Party's discovery requests to the extent  
4 they call for responses or information violative of any constitutional, statutory or common law  
5 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
6 other persons. Such information will not be provided.

7 4. Responding Party objects to Propounding Party's discovery requests on the bases  
8 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

9 5. Responding Party objects to Propounding Party's discovery requests to the extent  
10 they seek information or documents already in the possession, custody or control of Propounding  
11 Party, or are as easily accessible to Propounding Party as to Responding Party.

12 6. Responding Party objects to Propounding Party's discovery requests on the basis  
13 that they are violative of Federal Rules of Civil Procedure, Rule 34.

14 7. As used herein, all objections as to relevancy shall mean that the information  
15 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
16 to lead to the discovery of admissible evidence.

17 8. Nothing herein shall be construed as an admission by responding party as respects  
18 the admissibility or relevance of any fact or document.

19 9. Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the right  
20 to amend, supplement, or otherwise modify these disclosures should different, contrary, or additional  
21 information become available.

22 This preliminary statement and general objections are incorporated into each of the responses  
23 set forth below:

24 **RESPONSES TO REQUESTS FOR PRODUCTION**

25 **REQUEST FOR PRODUCTION NO. 1**

26 Produce all emails, faxes, or other written communications authored by or received by you  
27 between July 1, 2022 and October 1, 2022 regarding Plaintiffs, the scheduling of a hearing, or the  
28 forwarding of Plaintiffs' materials to SHRA staff.

**RESPONSE TO REQUEST NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad, irrelevant, compound and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 2**

Produce the email or document you sent confirming the September 12, 2022 hearing.

**RESPONSE TO REQUEST NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 3**

Produce any communications, notes, or memos referencing the “reasonable accommodation phone line” or indicating that you attempted to reach or refer Plaintiffs to it.

**RESPONSE TO REQUEST NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad as to time and scope, irrelevant, compound and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of

Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 4**

Produce any internal audit reports, help desk logs, or staff emails discussing technical issues, outages, or voicemail capacity problems associated with the SHRA Reasonable Accommodation phone line from January 1, 2022 to September 30, 2022.

**RESPONSE TO REQUEST NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

**REQUEST FOR PRODUCTION NO. 5**

Produce any recorded voicemail greetings, transcriptions, or system settings in use on the SHRA Reasonable Accommodation phone line during the same period.

**RESPONSE TO REQUEST NO. 5:**


Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this request to the extent it is overbroad, irrelevant, compound and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “the same period” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Without waiving said objections, Responding Party responds as follows: To the extent that Responsive Party has any documents responsive to this Request that are in its possession, custody, or control, Responding Party will comply with this Request. Pursuant to Federal Rule of Civil Procedure, Rule 34(b)(2)(B), Responding Party will produce said documents no later than May 30, 2025.

//



Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TAMEKA JACKSON'S RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TAMEKA JACKSON'S  
 RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TAMEKA JACKSON

SET NO.: One (1)

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1 Defendant, TAMEKA JACKSON, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discovery additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve  
22 the right to amend, supplement, or otherwise modify these disclosures should different, contrary,  
23 or additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify all employees who received or were forwarded any email or fax message from or on behalf of Plaintiffs by you between July 1, 2022 and October 1, 2022. For each such individual, describe their role and responsibilities.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to the Interrogatory as phrased is vague, ambiguous, and overbroad with respect to the time and scope of the information sought, and compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 1a and Interrogatory 1b for clarity.

**INTERROGATORY 1a:**

Identify all employees who received or were forwarded any email or fax message from or on behalf of Plaintiffs by you between July 1, 2022 and October 1, 2022.

**RESPONSE TO INTERROGATORY 1a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory on the grounds that it is vague, ambiguous, and overbroad as to scope. Specifically, Responding Party objects to this interrogatory because it is vague, ambiguous, impractical, and unduly burdensome because it necessitates extensive research into email and fax messages from over three years ago that are not readily accessible and may no longer exist. Further, such information is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

**INTERROGATORY 1b:**

For each individual identified in your response to Interrogatory 1a, describe their role and

responsibilities.

**RESPONSE TO INTERROGATORY 1b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory on the grounds that it is vague, ambiguous, and overbroad as to time and scope. Specifically, Responding Party objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding information that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

**INTERROGATORY NO. 2:**

Identify all SHRA employees or agents referred to as “upstairs” in SHRA internal communications or by you during the 2022 informal hearing scheduling process.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory on the grounds that it is vague, ambiguous, and overbroad as to time and scope. Responding Party further objects to the extent that this interrogatory assumes facts not in evidence, specifically, that Responding Party was involved in “the 2022 informal hearing scheduling process” and that the term “upstairs” was used to refer to SHRA employees or agents. Responding Party further objects to the term “scheduling process” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 3:**

Describe SHRA’s policies and procedures in effect between June 2022 and September 2022 for handling requests to schedule informal hearings following reasonable accommodation denials, including the steps staff were required to take when receiving such a request.

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**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “steps” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 4:**

Identify the name, position, and current contact information of any individual(s) responsible for managing or monitoring the SHRA Reasonable Accommodation phone line during the period from January 1, 2022 to September 30, 2022.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “managing” and “monitoring” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 5:**

Describe any known issues, complaints, or functionality limitations with the SHRA Reasonable Accommodation phone line between January 1, 2022 and September 30, 2022, including whether the voicemail was full, unmonitored, or disconnected during that time.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to

1 the Interrogatory as phrased as it is vague, ambiguous, unintelligible, overbroad with respect to scope  
2 of the information sought, and compound. Responding Party further objects to the term  
3 “functionality limitations” is vague, ambiguous, unintelligible, undefined, and subject to multiple  
4 interpretations. Responding Party will treat this as two separate Interrogatories, as provided by  
5 Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as  
6 Interrogatory 5a and Interrogatory 5b for clarity.

7 **INTERROGATORY 5a:**

8 Describe any known issues, complaints, or functionality limitations with the SHRA  
9 Reasonable Accommodation phone line between January 1, 2022 and September 30, 2022.

10 **RESPONSE TO INTERROGATORY 5a:**

11 Responding Party incorporates its Preliminary Statement and General Objections as though  
12 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
13 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
14 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
15 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
16 objects to the term “functionality limitations” is vague, ambiguous, unintelligible, undefined, and  
17 subject to multiple interpretations.

18 **INTERROGATORY 5b:**

19 Describe whether the SHRA Reasonable Accommodation voicemail was full, unmonitored,  
20 or disconnected between January 1, 2022 and September 30, 2022.

21 **RESPONSE TO INTERROGATORY 5b:**

22 Responding Party incorporates its Preliminary Statement and General Objections as though  
23 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
24 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
25 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
26 reasonably calculated to lead to the discovery of admissible evidence. Further, such information is  
27 neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to  
28 admissible evidence.

Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TAMEKA JACKSON'S RESPONSES TO PLAINTIFFS'  
INTERROGATORIES, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Geraldine Touseon

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 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TANYA CRUZ'S RESPONSES  
 TO PLAINTIFFS' REQUEST FOR  
 ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TANYA CRUZ

SET NO.: One (1)

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1 Defendant, TANYA CRUZ, by and through her attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set Two, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in



1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition to any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

#### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

##### 16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that you attended the April 20, 2023 hearing involving Plaintiffs.

##### 18 **RESPONSE TO REQUEST NO. 1:**

19 Responding Party is not able to admit or deny Request for Admission No. 1 for the following  
 20 reasons: Responding Party, although defended through Sacramento Housing and Redevelopment  
 21 Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and  
 22 confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party,  
 23 its former employee, in order to obtain information with which to provide responses to the herein  
 24 Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and  
 25 will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP  
 26 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information  
 27 known or readily availability is insufficient to enable that party to admit or deny the matter.

28 //

**REQUEST FOR ADMISSION NO. 2:**

Admit that you informed Plaintiffs during the April 20, 2023 hearing that the hearing would be cancelled and rescheduled.

**RESPONSE TO REQUEST NO. 2:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 2 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 3:**

Admit that you did not provide Plaintiffs with a written decision or explanation for the cancellation of the April 20, 2023 hearing.

**RESPONSE TO REQUEST NO. 3:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 3 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 4:**

Admit that you were aware of and did not provide real-time transcription or text-based communication accommodations requested by Plaintiffs.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 4 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 5:**

Admit that you did not ensure Plaintiffs had access to their case file before one or more scheduled hearings.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 5 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good

1 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 2 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
 3 concerning the matter and the information known or readily availability is insufficient to enable that  
 4 party to admit or deny the matter.

5 **REQUEST FOR ADMISSION NO. 6:**

6 Admit that you participated in internal SHRA discussions about Plaintiffs' hearing requests  
 7 or accommodations between 2022 and 2023.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 10 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 11 Admission No. 6 for the following reasons: Responding Party, although defended through  
 12 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 13 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
 14 additional time to contact Responding Party, its former employee, in order to obtain information  
 15 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 16 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 17 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
 18 concerning the matter and the information known or readily availability is insufficient to enable that  
 19 party to admit or deny the matter.

20 **REQUEST FOR ADMISSION NO. 7:**

21 Admit that you received or reviewed complaints, objections, or requests for clarification  
 22 from Plaintiffs related to the April 20, 2023 hearing.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 25 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 26 Admission No. 7 for the following reasons: Responding Party, although defended through  
 27 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 28 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires

1 additional time to contact Responding Party, its former employee, in order to obtain information  
 2 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 3 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 4 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
 5 concerning the matter and the information known or readily availability is insufficient to enable that  
 6 party to admit or deny the matter.

7 **REQUEST FOR ADMISSION NO. 8:**

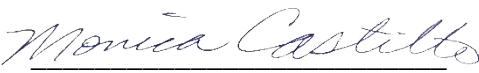
8 Admit that you stated or implied during the April 20, 2023 hearing that the cancellation  
 9 decision was not subject to Plaintiffs' objection or further review.

10 **RESPONSE TO REQUEST NO. 8:**

11 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 12 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 13 Admission No. 8 for the following reasons: Responding Party, although defended through  
 14 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 15 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
 16 additional time to contact Responding Party, its former employee, in order to obtain information  
 17 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 18 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 19 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
 20 concerning the matter and the information known or readily availability is insufficient to enable that  
 21 party to admit or deny the matter.

22  
 23 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
 EDELMAN & DICKER LLP**

24 By:   
 25 EDWARD P. GARSON  
 26 MONICA C. CASTILLO  
 27 CHANDNI B. MISTRY  
 28 Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TANYA CRUZ'S RESPONSES TO PLAINTIFF'S  
 REQUEST FOR ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TANYA CRUZ'S RESPONSES  
 TO PLAINTIFF'S INTERROGATORIES,  
 SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TANYA CRUZ

SET NO.: One (1)

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Defendant, TANYA CRUZ, (hereinafter referred to as “Defendant” or “Responding Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s Interrogatories, Set One, as follows:

**PRELIMINARY STATEMENT**

These responses and objections are based upon responding party’s diligent and best efforts to respond to these discovery requests based upon the investigation carried out to date with respect to facts relevant to this litigation. There may exist further information responsive to these discovery requests which is not within responding party’s present knowledge or reasonably available to responding party. There may be information relating to the subject matter of this discovery which responding party has not located, identified, or reviewed, despite its best efforts to do so. There may exist persons with knowledge relating to the subject matter of these discovery requests of whom responding party is not presently aware, whom it has not interviewed, or who have not been deposed. Accordingly, these responses and objections are based solely upon facts and information presently known to responding party, and these responses and objections do not constitute an admission or representation that additional facts, documents, or witnesses with knowledge relevant to the subject matter of this litigation do not exist.

In the course of this litigation, responding party may discover additional facts witnesses, or documents relevant to its discovery responses and objections set forth herein. Without any manner obligating itself to do so, responding party reserves the right to alter, supplement, amend or otherwise modify these responses at any time.

**GENERAL OBJECTIONS AND RESERVATIONS**

Each response and objection provided by responding party in response to propounding party's discovery requests herein is subject to the following General Objections and Reservations, which are incorporated into each of the responses set forth hereinafter:

1. Responding Party objects to Propounding Party's discovery requests to the extent they call for information which is protected from disclosure by the attorney-client privilege, the attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your current job title and responsibilities at SHRA, including your role in processing or overseeing informal hearings and reasonable accommodation requests.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 2:**

List all positions you have held at SHRA since 2018, including dates and descriptions of duties.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding employment information from over seven years ago that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence. Responding Party further objects to the term “roles” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 3:**

Describe your involvement in the informal hearings scheduled for Plaintiffs on September 12, 2022 and April 20, 2023, including your actions before, during, and after each hearing.

**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “involvement” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 4:**

Identify all communications you had with SHRA staff or hearing officers regarding the April 20, 2023 hearing and the decision to cancel or reschedule it.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 5:**

Describe your understanding of who had the authority to cancel the April 20, 2023 hearing, and the basis for your statement that the hearing would be rescheduled.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “your understanding” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to this interrogatory to the

1 extent that it assumes facts not in evidence, specifically that Responding Party made a “statement  
2 that the hearing would be rescheduled.” Responding Party further objects to this interrogatory to  
3 the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as  
4 provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate  
5 Interrogatories as Interrogatory 5a and Interrogatory 5b for clarity.

6 **INTERROGATORY 5a:**

7 Describe your understanding of who had the authority to cancel the April 20, 2023 hearing.

8 **RESPONSE TO INTERROGATORY 5a:**

9 Responding Party incorporates its Preliminary Statement and General Objections as though  
10 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
11 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
12 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
13 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
14 objects to the term “your understanding” as it is vague, subjective, ambiguous, undefined, and  
15 subject to multiple interpretations.

16 **INTERROGATORY 5b:**

17 Describe the basis for your statement that the hearing would be rescheduled.

18 **RESPONSE TO INTERROGATORY 5b:**

19 Responding Party incorporates its Preliminary Statement and General Objections as though  
20 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
21 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
22 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
23 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
24 objects to this interrogatory to the extent that it assumes facts not in evidence, specifically that  
25 Responding Party made a “statement that the hearing would be rescheduled.”

26 **INTERROGATORY NO. 6:**

27 State whether you were aware of Plaintiffs’ request for a real-time transcription or other  
28 communication accommodation for the April 20, 2023 hearing, and explain what actions you took

1 in response.

2 **RESPONSE TO INTERROGATORY NO. 6:**

3 Responding Party incorporates its Preliminary Statement and General Objections as though  
4 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
5 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
6 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
7 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
8 objects to the term “communication accommodation” as it is vague, subjective, ambiguous,  
9 unintelligible, undefined, and subject to multiple interpretations. Responding Party further objects  
10 to this interrogatory to the extent that it is compound. Responding Party will treat this as two  
11 separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and  
12 identify the separate Interrogatories as Interrogatory 6a and Interrogatory 6b for clarity.

13 **INTERROGATORY 6a:**

14 State whether you were aware of Plaintiffs’ request for a real-time transcription or other  
15 communication accommodation for the April 20, 2023 hearing.

16 **RESPONSE TO INTERROGATORY 6a:**

17 Responding Party incorporates its Preliminary Statement and General Objections as though  
18 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
19 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
20 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
21 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
22 objects to the term “communication accommodation” as it is vague, subjective, ambiguous,  
23 unintelligible, undefined, and subject to multiple interpretations.

24 **INTERROGATORY 6b:**

25 If you were aware of Plaintiffs’ request for a real-time transcription or other communication  
26 accommodation for the April 20, 2023 hearing, and explain what actions you took in response.

27 **RESPONSE TO INTERROGATORY 6b:**

28 Responding Party incorporates its Preliminary Statement and General Objections as though

1 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
 2 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
 3 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
 4 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
 5 objects to the term “communication accommodation” as it is vague, subjective, ambiguous,  
 6 unintelligible, undefined, and subject to multiple interpretations.

7 **INTERROGATORY NO. 7:**

8 Identify all SHRA policies or procedures you relied on when denying, deferring, or  
 9 modifying Plaintiffs’ accommodation requests or participation in informal hearings.

10 **RESPONSE TO INTERROGATORY NO. 7:**

11 Responding Party incorporates its Preliminary Statement and General Objections as though  
 12 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
 13 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
 14 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
 15 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further  
 16 objects to this interrogatory to the extent that it assumes facts not in evidence, specifically that  
 17 Responding Party “den[ied], defer[ed], or modif[ied] Plaintiffs’ accommodation requests or  
 18 participation in informal hearings.”

19 **INTERROGATORY NO. 8:**

20 Identify and describe any internal records, notes, memos, or hearing summaries you  
 21 authored or reviewed related to Plaintiffs between July 2022 and July 2023.

22 **RESPONSE TO INTERROGATORY NO. 8:**

23 Responding Party incorporates its Preliminary Statement and General Objections as though  
 24 fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds  
 25 the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects  
 26 to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not  
 27 reasonably calculated to lead to the discovery of admissible evidence.

28 //

Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

By: 

EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants



**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TANYA CRUZ'S RESPONSES TO PLAINTIFFS' INTERROGATORIES,  
SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

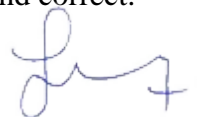
☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Geraldine Touseon

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 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TIFFANY BROWN'S  
 RESPONSES TO PLAINTIFFS' REQUEST  
 FOR ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TIFFANY BROWN

SET NO.: One (1)

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1 Defendant, TIFFANY BROWN, by and through her attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides her Responses to Requests for Admissions,  
3 Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition to any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

#### 16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that you received one or more documents or messages from or concerning Plaintiffs  
 18 between March and June 2022.

#### 19 **RESPONSE TO REQUEST NO. 1:**

20 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 21 Without waiving said objection, Responding Party is not able to admit or deny Request for  
 22 Admission No. 1 for the following reasons: Responding Party, although defended through  
 23 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
 24 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
 25 additional time to contact Responding Party, its former employee, in order to obtain information  
 26 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
 27 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
 28 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

1 concerning the matter and the information known or readily availability is insufficient to enable that  
2 party to admit or deny the matter.

3 **REQUEST FOR ADMISSION NO. 2:**

4 Admit that you did not personally notify Plaintiffs or their representative that the documents  
5 had been received.

6 **RESPONSE TO REQUEST NO. 2:**

7 Responding Party is not able to admit or deny Request for Admission No. 2 for the following  
8 reasons: Responding Party, although defended through Sacramento Housing and Redevelopment  
9 Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and  
10 confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party,  
11 its former employee, in order to obtain information with which to provide responses to the herein  
12 Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and  
13 will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP  
14 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information  
15 known or readily availability is insufficient to enable that party to admit or deny the matter.

16 **REQUEST FOR ADMISSION NO. 3:**

17 Admit that you did not follow up with SHRA supervisory staff to ensure that Plaintiffs' RA  
18 request was being reviewed.

19 **RESPONSE TO REQUEST NO. 3:**

20 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
21 Without waiving said objection, Responding Party is not able to admit or deny Request for  
22 Admission No. 3 for the following reasons: Responding Party, although defended through  
23 Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee  
24 of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires  
25 additional time to contact Responding Party, its former employee, in order to obtain information  
26 with which to provide responses to the herein Requests for Admission. SHRA is continuing good  
27 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
28 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry

concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 4:**

Admit that you took no action to confirm that Plaintiffs' RA request had been forwarded to the appropriate party.

**RESPONSE TO REQUEST NO. 4:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 4 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good faith efforts to contact Responding Party and will supplement the herein Responses once it is able to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry concerning the matter and the information known or readily availability is insufficient to enable that party to admit or deny the matter.

**REQUEST FOR ADMISSION NO. 5:**

Admit that your failure to confirm or log the receipt of Plaintiffs' documents contributed to delays in their accommodation review.

**RESPONSE TO REQUEST NO. 5:**

Responding Party objects to this Request to the extent it contains vague or ambiguous terms. Without waiving said objection, Responding Party is not able to admit or deny Request for Admission No. 5 for the following reasons: Responding Party, although defended through Sacramento Housing and Redevelopment Agency (hereinafter "SHRA"), is no longer an employee of SHRA. As explained in prior meet and confer efforts with Propounding Party, SHRA requires additional time to contact Responding Party, its former employee, in order to obtain information with which to provide responses to the herein Requests for Admission. SHRA is continuing good



1 faith efforts to contact Responding Party and will supplement the herein Responses once it is able  
2 to do so. Accordingly, pursuant to FRCP 36(a)(4), Responding Party has made a reasonable inquiry  
3 concerning the matter and the information known or readily availability is insufficient to enable that  
4 party to admit or deny the matter.

5  
6 Dated: May 12, 2025

**WILSON ELSE MOSKOWITZ  
EDELMAN & DICKER LLP**

7 By: *Monica Castillo*  
8 EDWARD P. GARSON  
9 MONICA C. CASTILLO  
10 CHANDNI B. MISTRY  
11 Attorneys for Defendants  
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**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TIFFANY BROWN'S RESPONSES TO PLAINTIFFS' REQUEST FOR  
 ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TORY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TIFFANY BROWN'S  
 RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TIFFANY BROWN

SET NO.: One (1)

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1 Defendant, TIFFANY BROWN, (hereinafter referred to as “Defendant” or “Responding  
2 Party”), by and through her attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP,  
3 hereby responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discover additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

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**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your job title and responsibilities at SHRA between January 1, 2022 and July 1, 2022, particularly with regard to the intake, routing, or screening of reasonable accommodation requests.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 2:**

Describe any communications you had with Ashley Valentine of Sacramento Self Help Housing or any SHRA staff member about documents submitted on behalf of Plaintiffs related to housing or accommodation.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 3:**

Identify all documents, faxes, or electronic submissions referencing Plaintiffs or their representative that you personally received, scanned, logged, or forwarded between March and June 2022.

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**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “logged” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 4:**

Describe any role you played in processing or confirming receipt of RA documentation submitted through SHRA’s online portal or dropbox in that timeframe.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “RA documentation” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to the term “that timeframe” as it is vague, subjective, ambiguous, unspecific, undefined, and subject to multiple interpretations in such a way that renders the interrogatory unintelligible.

**INTERROGATORY NO. 5:**

State whether you maintained or monitored any shared intake voicemail or email accounts that may have received messages related to Plaintiffs’ accommodation or hearing requests.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects



to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “shared” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 6:**

Identify any SHRA employees you referred or forwarded Plaintiffs’ materials to, and describe the method and timing of the forwarding.

**RESPONSE TO INTERROGATORY NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “referred,” “materials,” and “timing” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 6a and Interrogatory 6b for clarity.

**INTERROGATORY 6a:**

Identify any SHRA employees you referred or forwarded Plaintiffs’ materials to.

**RESPONSE TO INTERROGATORY 6a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms “referred” and “materials” as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY 6b:**

Describe the method and timing of the forwarding of Plaintiffs' materials.

**RESPONSE TO INTERROGATORY 6b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the terms "timing" and "materials" as they are vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:



EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
 USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TIFFANY BROWN'S RESPONSES TO PLAINTIFFS'  
 INTERROGATORIES, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
 \_\_\_\_\_  
 Geraldine Touseon

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 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TROY LYNCH'S RESPONSES  
 TO PLAINTIFFS' REQUEST FOR  
 ADMISSION, SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TROY LYNCH

SET NO.: One (1)

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1 Defendant, TROY LYNCH, by and through his attorneys of record, Wilson, Elser,  
2 Moskowitz, Edelman & Dicker LLP, hereby provides his Responses to Requests for Admissions,  
3 Set One, propounded by Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE  
4 SAMUEL, as follows:

5 **PRELIMINARY STATEMENT**

6 Responding Party has not completed his investigation or discovery in this action. This  
7 response is based on Responding Party's knowledge, information and belief at this time, and is  
8 complete to the best of his present knowledge and understanding. Responding Party reserves the  
9 right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of  
10 trial any and all facts, evidence, documents and things developed during the course of discovery and  
11 trial preparation, notwithstanding the reference to facts, evidence, documents, and things in this  
12 response. Responding Party assumes no obligation to voluntarily supplement or amend this response  
13 to reflect facts, evidence, or other information discovered following service of this response.  
14 Nevertheless, this response is given without prejudice to subsequent revision or supplementation  
15 based upon facts, evidence, and other information, which hereafter may be discovered.

16 **GENERAL OBJECTIONS**

17 The following General Objections are applicable to and incorporated into each response. The  
18 assertion of the same, similar, or additional objections in any specific response does not waive  
19 Responding Party's general objections as set forth below:

20 1. Responding Party objects to the following Requests for Admission to the extent that  
21 any of them seek information protected from disclosure by the attorney-client privilege, the work  
22 product doctrine, patient-psychiatrist privilege, and/or any other applicable privilege or protection.  
23 Responding Party intends to and does claim privilege with respect to all such information and  
24 declines to provide any such information. Any inadvertent disclosure of privileged or protected  
25 information is not intended to be, and should not be deemed, a waiver of any privilege or protection  
26 from disclosure.

27 2. Responding Party objects to the following Requests for Admissions to the extent that  
28 they seek to impose obligations or burdens that exceed those imposed by the Federal Rules of Civil

1 Procedure.

2 3. Responding Party objects to the following Requests for Admissions to the extent that  
3 they seek confidential information and/or private information of third parties. Such information will  
4 be provided only pursuant to the terms of an appropriate protective order and/or with the written  
5 consent of such third parties.

6 4. Responding Party objects to the following Requests for Admissions to the extent that  
7 they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

8 5. Responding Party objects to the following Requests for Admissions to the extent that  
9 they seek information outside the possession, control, or custody of Responding Party.

10 6. Responding Party objects to the following Requests for Admissions to the extent that  
11 they seek information and/or documents irrelevant to the dispute at issue in this lawsuit and unlikely  
12 to lead to the discovery of admissible evidence.

13 7. Responding Party objects to the following Requests for Admissions to the extent that  
14 they are overbroad, unduly burdensome and harassing, and to the extent that they seek documents  
15 and information that are equally available to Propounding Party, publicly available, and/or that are  
16 more properly and more readily obtained from third parties.

17 8. Responding Party objects to the following Requests for Admissions to the extent that  
18 they contain vague or ambiguous terms, as such Requests for Admissions are overbroad, unduly  
19 burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible  
20 evidence.

21 9. Responding Party objects to the following Requests for Admissions as premature as  
22 investigation and fact and expert discovery is ongoing in this action, and reserves the right to  
23 supplement all responses, pursuant to Rule 36, subsequent to the completion of discovery.

24 10. Information provided in response to the Requests for Admissions are provided  
25 without waiver of, and with express reservation of: (a) all objections as to the competency, relevancy,  
26 materiality, and admissibility of such information and the subject matter thereof as evidence for any  
27 purpose in any further proceeding in this action, or in any other action; (b) the right to object to the  
28 use of such information, or the subject matter thereof, on any ground in any further proceeding in

1 this action, or in any other action; and (c) the right to object on any ground at any time to a demand  
 2 or Requests for further responses to these Requests for Admissions or any other Requests or other  
 3 discovery proceedings.

4 11. The Specific Responses below are based upon information reasonably available to  
 5 Responding Party as of the date of this Response, after having made a diligent search. Responding  
 6 Party reserves the right to supplement, revise, or correct any response pursuant to Fed. R. Civ. P.  
 7 26(e) during and subsequent to the completion of discovery. The Specific Responses are made  
 8 without prejudice to Responding Party's right to present at trial, or in support or opposition of any  
 9 dispositive motion, additional evidence or witnesses as they may be discovered or produced.  
 10 Responding Party further reserves the right to challenge the competence, relevance, materiality, and  
 11 admissibility at trial or any subsequent proceeding, of this or any other action, of any information or  
 12 documents it provides in response to these Requests.

13 The foregoing General Objections are incorporated into the responses of each of the Requests  
 14 for Admissions below as though set forth fully therein.

### 15 **RESPONSES TO REQUESTS FOR ADMISSION**

#### 16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that you were present at the June 2, 2023 hearing involving Plaintiffs.

#### 18 **RESPONSE TO REQUEST NO. 1:**

19 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
 20 to provide responses to these requests and reserves the right to supplement and/or amend this  
 21 response pursuant to FRCP 26(e).

#### 22 **REQUEST FOR ADMISSION NO. 2:**

23 Admit that you supervised or provided training to Tanya Cruz with regard to SHRA informal  
 24 hearing procedures in 2022 or 2023.

#### 25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
 27 Without waiving said objection, this Request for Admission is denied. Responding Party is  
 28 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests



1 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

2 **REQUEST FOR ADMISSION NO. 3:**

3 Admit that you were aware of Plaintiffs' request for real-time captioning or transcription for  
4 one or more hearings.

5 **RESPONSE TO REQUEST NO. 3:**

6 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
7 Without waiving said objection, this Request for Admission is denied. Responding Party is  
8 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
9 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

10 **REQUEST FOR ADMISSION NO. 4:**

11 Admit that SHRA did not issue a written decision following the September 12, 2022 hearing.

12 **RESPONSE TO REQUEST NO. 4:**

13 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
14 to provide responses to these requests and reserves the right to supplement and/or amend this  
15 response pursuant to FRCP 26(e).

16 **REQUEST FOR ADMISSION NO. 5:**

17 Admit that SHRA did not issue a written decision following the June 2, 2023 hearing.

18 **RESPONSE TO REQUEST NO. 5:**

19 Denied. Responding Party is continuing to make a reasonable inquiry in a good faith effort  
20 to provide responses to these requests and reserves the right to supplement and/or amend this  
21 response pursuant to FRCP 26(e).

22 **REQUEST FOR ADMISSION NO. 6:**

23 Admit that you participated in or attended one or more SHRA Reasonable Accommodation  
24 Committee meetings between 2022 and 2023 where Plaintiffs' requests were discussed.

25 **RESPONSE TO REQUEST NO. 6:**

26 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
27 Without waiving said objection, this Request for Admission is denied. Responding Party is  
28 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests

1 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that you authored or received communications related to Plaintiffs' hearing access,  
4 accommodation requests, or complaints.

5 **RESPONSE TO REQUEST NO. 7:**

6 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
7 Without waiving said objection, this Request for Admission is denied. Responding Party is  
8 continuing to make a reasonable inquiry in a good faith effort to provide responses to these requests  
9 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

10 **REQUEST FOR ADMISSION NO. 8:**

11 Admit that you did not provide Plaintiffs access to their case file prior to one or more  
12 scheduled hearings.

13 **RESPONSE TO REQUEST NO. 8:**

14 Responding Party objects to this Request to the extent it contains vague or ambiguous terms.  
15 Without waiving said objection, this Request for Admission is denied. Responding Party is  
16 continuing to make a reasonable inquiry as a good faith effort to provide responses to these requests  
17 and reserves the right to supplement and/or amend this response pursuant to FRCP 26(e).

18  
19  
20 Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

21 By: 

22 EDWARD P. GARSON  
23 MONICA C. CASTILLO  
24 CHANDNI B. MISTRY  
25 Attorneys for Defendants  
26  
27  
28

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TROY LYNCH'S RESPONSES TO PLAINTIFFS' REQUEST FOR ADMISSION, SET ONE**

☐: **PERSONAL SERVICE** - I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below, and providing them to a professional messenger service for service. (A confirmation by the messenger will be provided to our office after the documents have been delivered.)

☒: **BY MAIL** - As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on this date following our ordinary practices. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐: **OVERNIGHT MAIL** - As follows: I am "readily familiar" with the firm's practice of processing correspondence for mailing overnight via Federal Express. Under that practice it would be deposited in a Federal Express drop box, indicating overnight delivery, with delivery fees provided for, on that same day, at San Francisco, California.

☒: **BY E-MAIL** - Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.



Geraldine Touson

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Attorneys for Defendants SACRAMENTO  
 HOUSING AND REDEVELOPMENT AGENCY,  
 LA SHELLE DOZIER, MARYLIZ PAULSON,  
 TROY LYNCH, TANYA CRUZ, TAMEKA  
 JACKSON, LISA MACIAS, TIFFANY BROWN,  
 and IBRA HENLEY

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND  
 REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 TLN AC PS

**DEFENDANT TROY LYNCH'S RESPONSES  
 TO PLAINTIFFS' INTERROGATORIES,  
 SET ONE**

**[FED. R. CIV. P. 26(A)(1)]**

Honorable Allison Claire

PROPOUNDING PARTY: Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID  
 TYRONE SAMUEL

RESPONDING PARTY: Defendant, TROY LYNCH

SET NO.: One (1)

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1 Defendant, TROY LYNCH, (hereinafter referred to as “Defendant” or “Responding Party”),  
2 by and through his attorneys of record, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby  
3 responds to Plaintiffs, SYDNEY BROOKE ROBERTS and DAVID TYRONE SAMUEL’s  
4 Interrogatories, Set One, as follows:

5 **PRELIMINARY STATEMENT**

6 These responses and objections are based upon responding party’s diligent and best efforts  
7 to respond to these discovery requests based upon the investigation carried out to date with respect  
8 to facts relevant to this litigation. There may exist further information responsive to these  
9 discovery requests which is not within responding party’s present knowledge or reasonably  
10 available to responding party. There may be information relating to the subject matter of this  
11 discovery which responding party has not located, identified, or reviewed, despite its best efforts to  
12 do so. There may exist persons with knowledge relating to the subject matter of these discovery  
13 requests of whom responding party is not presently aware, whom it has not interviewed, or who  
14 have not been deposed. Accordingly, these responses and objections are based solely upon facts  
15 and information presently known to responding party, and these responses and objections do not  
16 constitute an admission or representation that additional facts, documents, or witnesses with  
17 knowledge relevant to the subject matter of this litigation do not exist.

18 In the course of this litigation, responding party may discovery additional facts witnesses,  
19 or documents relevant to its discovery responses and objections set forth herein. Without any  
20 manner obligating itself to do so, responding party reserves the right to alter, supplement, amend  
21 or otherwise modify these responses at any time.

22 **GENERAL OBJECTIONS AND RESERVATIONS**

23 Each response and objection provided by responding party in response to propounding  
24 party's discovery requests herein is subject to the following General Objections and Reservations,  
25 which are incorporated into each of the responses set forth hereinafter:

26 1. Responding Party objects to Propounding Party's discovery requests to the extent  
27 they call for information which is protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, and/or other applicable privileges, including documents prepared

1 in anticipation of litigation. Such information will not be provided.

2           2.       Responding Party objects to Propounding Party's discovery requests to the extent  
3 they call for responses containing privileged, proprietary and/or confidential business information  
4 or trade secrets. Such information will not be provided.

5           3.       Responding Party objects to Propounding Party's discovery requests to the extent  
6 they call for responses or information violative of any constitutional, statutory or common law  
7 privacy rights of Responding Party, any current or former employee of Responding Party, or any  
8 other persons. Such information will not be provided.

9           4.       Responding Party objects to Propounding Party's discovery requests on the bases  
10 that they are not reasonably limited in time, are overboard, vague, ambiguous and unintelligible.

11           5.       Responding Party objects to Propounding Party's discovery requests to the extent  
12 they seek information or documents already in the possession, custody or control of Propounding  
13 Party, or are as easily accessible to Propounding Party as to Responding Party.

14           6.       Responding Party objects to Propounding Party's discovery requests on the basis  
15 that they are violative of Federal Rules of Civil Procedure, Rule 33.

16           7.       As used herein, all objections as to relevancy shall mean that the information  
17 requested is neither relevant to the subject matter of the pending action nor reasonably calculated  
18 to lead to the discovery of admissible evidence.

19           8.       Nothing herein shall be construed as an admission by responding party as respects  
20 the admissibility or relevance of any fact or document.

21           9.       Pursuant to Federal Rule of Civil Procedure, Rule 26(e), Defendants fully reserve the  
22 right to amend, supplement, or otherwise modify these disclosures should different, contrary, or  
23 additional information become available.

24 //

25 //

26 //

27 //

28 //

**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Identify your current job title, responsibilities, and role within SHRA, including any supervision responsibilities over hearing officers or accommodation staff.

**RESPONSE TO INTERROGATORY NO. 1:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 2:**

Identify all job titles you have held at SHRA since 2018 and describe the duties associated with each position, especially with regard to informal hearings or accommodation review.

**RESPONSE TO INTERROGATORY NO. 2:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory because it is vague, ambiguous, and overly burdensome because it seeks a high level of detail regarding employment information from over seven years ago that is neither relevant to the incident giving rise to this litigation, nor reasonably calculated to lead to admissible evidence.

**INTERROGATORY NO. 3:**

Describe your involvement in any training or oversight of Tanya Cruz during the 2022 or 2023 calendar years, including any documents authored or reviewed in connection with her participation in the Plaintiffs' hearings.

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**RESPONSE TO INTERROGATORY NO. 3:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “oversight” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 4:**

Identify all dates you were scheduled to appear or did appear for any hearing involving Plaintiffs, including the September 12, 2022 and June 2, 2023 proceedings.

**RESPONSE TO INTERROGATORY NO. 4:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “proceedings” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 5:**

Describe the role you played during the June 2, 2023 hearing, including any decisions made, instructions given, or documents reviewed before or after the hearing.

**RESPONSE TO INTERROGATORY NO. 5:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further

objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 5a and Interrogatory 5b for clarity.

**INTERROGATORY 5a:**

Describe the role you played during the June 2, 2023 hearing, including any decisions made or instructions given.

**RESPONSE TO INTERROGATORY NO. 5a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the interrogatory to the extent that it is overbroad as to time and scope, thereby rendering it unintelligible.

**INTERROGATORY 5b:**

Describe the documents reviewed before or after the June 2, 2023 hearing.

**RESPONSE TO INTERROGATORY NO. 5b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects that this request is so vague, ambiguous, overbroad as to time and scope, and unintelligible, requiring Responding Party to speculate what information is sought and renders the compliance unfeasible.

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**INTERROGATORY NO. 6:**

State whether you are or were at any time between 2020 and 2024 a member of the SHRA Reasonable Accommodation Committee. If so, describe your role and participation in the review or denial of accommodation requests submitted by Plaintiffs.

**RESPONSE TO INTERROGATORY NO. 6:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 6a and Interrogatory 6b for clarity.

**INTERROGATORY 6a:**

State whether you are or were at any time between 2020 and 2024 a member of the SHRA Reasonable Accommodation Committee.

**RESPONSE TO INTERROGATORY 6a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 6b:**

If your response to Interrogatory 6a was yes, describe your role and participation in the review or denial of accommodation requests submitted by Plaintiffs

**RESPONSE TO INTERROGATORY 6b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds

the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad as to time and scope, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to the term “role” as it is vague, subjective, ambiguous, undefined, and subject to multiple interpretations.

**INTERROGATORY NO. 7:**

Describe any communication you had with other SHRA staff between July 2022 and July 2023 about Plaintiffs, their accommodation requests, or hearing scheduling. Identify participants, dates, and the substance of each communication.

**RESPONSE TO INTERROGATORY NO. 7:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 8:**

Identify and describe any internal notes, memoranda, or summaries you prepared or received regarding the hearings involving Plaintiffs, and whether those records were shared with the Plaintiffs.

**RESPONSE TO INTERROGATORY NO. 8:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this interrogatory to the extent that it is compound. Responding Party will treat this as two separate Interrogatories, as provided by Federal Rules of Civil Procedure, Rule 33(a)(1), and identify the separate Interrogatories as Interrogatory 8a and Interrogatory 8b for clarity.

**INTERROGATORY NO. 8a:**

Identify and describe any internal notes, memoranda, or summaries you prepared or received regarding the hearings involving Plaintiffs.

**RESPONSE TO INTERROGATORY NO. 8a:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY NO. 8b:**


Identify whether internal notes, memoranda, or summaries you prepared or received regarding the hearings involving Plaintiffs were shared with the Plaintiffs.

**RESPONSE TO INTERROGATORY NO. 8b:**

Responding Party incorporates its Preliminary Statement and General Objections as though fully set forth herein. Responding Party objects to this interrogatory on the grounds that it exceeds the number of interrogatories permissible, per Fed. R. Civ. P. 33(a)(1). Responding Party objects to this interrogatory to the extent it is overbroad, vague, ambiguous, unintelligible, and not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 12, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

By:   
EDWARD P. GARSON  
MONICA C. CASTILLO  
CHANDNI B. MISTRY  
Attorneys for Defendants

**PROOF OF SERVICE**

*Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.*  
USDC, Eastern District of California, No. 2:22-cv-01699 TLN AC PS

I, the undersigned, am employed in the county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 655 Montgomery Street, Suite 900, San Francisco CA 94111.

On the date indicated below, I caused to be served the following document(s) described as follows:

**DEFENDANT TROY LYNCH'S RESPONSES TO PLAINTIFFS' INTERROGATORIES,  
SET ONE**

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☐: **BY ELECTRONIC TRANSMISSION** - By causing the document(s) listed above to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office.

Executed on May 12, 2025, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California, that the above is true and correct.

  
\_\_\_\_\_  
Geraldine Touson

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May 13, 2025

VIA EMAIL  
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Re: Roberts et al. v. Sacramento Housing and Redevelopment Agency et al.

Case No. 2:22-cv-01699 DJC AC

Dear Ms. Castillo and Mr. Garson:

We are in receipt of your May 12, 2025 letter refusing to identify SHRA's Rule 30(b)(6) designees in response to our April 16 request. Respectfully, your position is both premature and inconsistent with the Federal Rules' cooperative discovery framework.

Courts within the Ninth Circuit have repeatedly encouraged parties to confer in advance of a formal Rule 30(b)(6) notice to promote efficiency and avoid unnecessary disputes. See U.S. E.E.O.C. v. Thorman & Wright Corp., No. CIV S-07-0047 LKK-GGH, 2009 WL 764466, at \*4 (E.D. Cal. Mar. 19, 2009) ("While Rule 30(b)(6) does not require pre-deposition conferences, such cooperation is consistent with the spirit of the discovery rules and Rule 1."). Moreover, Local Rule 251(b) and the Court's Standing Order both emphasize early and meaningful engagement to resolve discovery issues without court intervention.

Our April 16 letter identified general subject areas for the anticipated Rule 30(b)(6) deposition, including:

- SHRA's voucher approval and affordability determination process;
- RFTA approval timelines and related delays;
- Geographic distribution of voucher utilization;
- Composition and procedures of the Reasonable Accommodation Committee.

Identifying potential designees in advance would allow both parties to avoid scheduling conflicts, ensure the witness is properly prepared, and potentially limit the number of deposition topics noticed all of which serve to reduce burden and promote efficiency. This approach is routine in federal discovery and consistent with your own professional obligations under Rule 1 and Rule 26(g).



Unfortunately, your refusal to engage follows a broader pattern in which SHRA has declined to provide basic information about its organizational structure, refused to identify staff involved in core decisions, and failed to comply with Rule 26(a) disclosure obligations. We remain willing to confer in good faith to avoid unnecessary motion practice.

Please confirm by May 14 whether SHRA will engage in a good-faith discussion regarding Rule 30(b)(6) topic coverage and witness availability. If not, we will proceed with formal notice and reserve the right to seek fees and sanctions under Rule 37.

Sincerely,

David Samuel  
Sydney Roberts



David Samuel &lt;davidsa@possiblymaybe.com&gt;

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**Discovery Dispute under Local Rule 251 – SHRA et al.**

3 messages

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**David Samuel** <davidsa@possiblymaybe.com>

Mon, May 12, 2025 at 6:45 PM

To: "Garson, Edward" &lt;edward.garson@wilsonelser.com&gt;, "Castillo, Monica" &lt;monica.castillo@wilsonelser.com&gt;

Counsel,

Please see the attached meet-and-confer letter regarding Defendants' May 12 discovery responses. The letter outlines a pattern of obstruction and evasive conduct across all parties, including blanket refusals to respond, false denials of record-based facts, and new claims that SHRA cannot contact multiple named defendants it continues to represent.

This letter is submitted under Local Rule 251 and constitutes Plaintiffs' final attempt to resolve these deficiencies without immediate court intervention. If we do not receive confirmation of full supplementation by May 15, we will move to compel under Rule 37, seek sanctions and cost-shifting, and request a discovery deadline extension. Plaintiffs will also submit a proposed order with adverse inference instructions and may request a discovery conference with Magistrate Judge Claire.

We further demand that SHRA preserve all responsive records, including email, voicemail, internal logs, hearing videos, and any materials associated with Cruz, Brown, Henley, or Paulson. No further delay will be accepted.

Best Regards,

David



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**Discovery\_Dispute\_Letter\_SHRA\_May12\_2025.pdf**

46K

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**Mistry, Chandni** <Chandni.Mistry@wilsonelser.com>

Wed, May 14, 2025 at 4:12 PM

To: David Samuel &lt;davidsa@possiblymaybe.com&gt;

Cc: "Castillo, Monica" &lt;Monica.Castillo@wilsonelser.com&gt;, "Garson, Edward" &lt;Edward.Garson@wilsonelser.com&gt;, "Cheung, Alexander" &lt;Alexander.Cheung@wilsonelser.com&gt;, "Carinio, Jasmine" &lt;Jasmine.Carinio@wilsonelser.com&gt;, "Figueroa, Michael" &lt;Michael.Figueroa@wilsonelser.com&gt;

Dear Mr. Samuel,

We are working with our client to obtain dates of availability for the deposition regarding the topics you have previously outlined. We assure you that it is our intention to work together in good faith to select dates that work for both parties, and once those dates have been identified, we will await service of the Notice of Deposition, per code. We apologize for any misunderstanding our last correspondence seemed to have caused.

With regard to Defendants' response to Plaintiff's various sets of Requests for Production, we have responded fully and will produce the documents no later than May 30, 2025, as allowed per FRCP 34(b)(2)(B).

With regard to Plaintiffs' interrogatories, the number of interrogatories served exceeds the maximum number of 25 as allowed per FRCP 33(a)(1). We have accordingly responded to the first 25 interrogatories served on Defendants, per code.

With regard to Defendants' responses to Plaintiff's discovery requests served on 4/12/25, you have not identified any specific deficiencies in Defendants' responses beyond making a broad statement that Defendants "served only blanket objections and denials." Despite your lack of specificity, Defendants will provide amended responses as appropriate by May 30, 2025 in good faith.

Thank you,

Chandni Mistry  
Attorney at Law  
Wilson Elser Moskowitz Edelman & Dicker LLP  
655 Montgomery St., Ste. 900  
San Francisco, CA 94111  
415.625.9390 (Direct)  
415.433.0990 (Main)  
415.434.1370 (Fax)  
[chandni.mistry@wilsonelser.com](mailto:chandni.mistry@wilsonelser.com)

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**From:** David Samuel <[davidsa@possiblymaybe.com](mailto:davidsa@possiblymaybe.com)>  
**Sent:** Monday, May 12, 2025 6:46 PM  
**To:** Garson, Edward <[Edward.Garson@wilsonelser.com](mailto:Edward.Garson@wilsonelser.com)>; Castillo, Monica <[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)>  
**Subject:** Discovery Dispute under Local Rule 251 – SHRA et al.

**EXTERNAL EMAIL** This email originated from outside the organization.

[Quoted text hidden]

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Thank you.

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David Samuel <davidsa@possiblymaybe.com>

Wed, May 14, 2025 at 5:08 PM

To: "Mistry, Chandni" <Chandni.Mistry@wilsonelser.com>, "Maddy, David and Artemis Samuel"

<home@possiblymaybe.com>, Barbara McGarvey <sea@possiblymaybe.com>

Cc: "Castillo, Monica" <Monica.Castillo@wilsonelser.com>, "Garson, Edward" <Edward.Garson@wilsonelser.com>, "Cheung, Alexander" <Alexander.Cheung@wilsonelser.com>, "Carinio, Jasmine" <Jasmine.Carinio@wilsonelser.com>, "Figueroa, Michael" <Michael.Figueroa@wilsonelser.com>

Counsel:

Your May 14, 2025 email crystallizes Defendants' ongoing strategy: a persistent pattern of delay, evasion, and misrepresentation designed to obstruct discovery and prejudice Plaintiffs' ability to prosecute this case, in direct violation of the Federal Rules of Civil Procedure. This conduct will be detailed in our imminent Rule 37 motion.

Defendants' April 10, 2025, declaration of intent to withhold all discovery pending summary judgment was not an isolated act but consistent with their long-standing approach. Despite Plaintiffs' good-faith efforts, including granting an initial extension and subsequently offering a further extension to May 30, 2025, for all outstanding April discovery contingent upon reasonable conditions such as rolling production of non-contingent documents and Defendants *rejected* these minimal good-faith terms. Your current proposal of a May 30 deadline, weeks after original and extended deadlines have lapsed and devoid of any commitment to interim compliance, underscores this refusal to engage cooperatively. This protracted delay, especially given the nearly three-year pendency of this case and Defendants' pursuit of summary judgment while actively thwarting discovery, mandates sanctions.

The discovery responses recently served are replete with boilerplate objections and evasions. Plaintiffs have exhaustively detailed these deficiencies in multiple communications. Your assertion that Plaintiffs failed to specify these issues is belied by the record.

Defendants' misapplication of Rule 33(a)(1) to refuse substantive answers to the four (4) interrogatories served on Defendant SHRA is a baseless attempt to evade providing critical information. The 25-interrogatory limit applies per party; your clients' interpretation is unsupported and further evidence of obstruction.

More fundamentally, Defendants' discovery conduct reveals a systemic failure that dates back significantly further. Defendants' May 1, 2024 Initial Disclosures are demonstrably false and misleading by omission. For example, despite SHRA now producing a general RACC rotation schedule (Ex. R), indicating their awareness of numerous individuals involved in reasonable accommodation decisions, **none of these obviously relevant individuals were identified in those year-old Initial Disclosures as required by Rule 26(a)(1)(A)(i).** This is not a mere oversight; it is part of the same pattern of withholding information that has persisted since early 2023, when Plaintiffs first began formally requesting details about SHRA's decision-makers and processes. This continuous failure to disclose obviously responsive parties and information has severely hampered Plaintiffs' ability to conduct timely and targeted discovery.

This pattern is further illuminated by Defendants' self-serving and contradictory positions on when discovery even "commenced." In their May 1, 2024 Initial Disclosures, they asserted discovery was "not yet open," despite this Court's April 18, 2024 Scheduling Order (Dkt. 58) authorizing discovery. Yet, in their April 15, 2025 Opposition to Plaintiffs' motion regarding a Rule 26(f) conference (Dkt. 95), Defendants conveniently reversed, arguing the same April 2024 Order *had* initiated discovery. **These shifting narratives are not good-faith misunderstandings; they are tactical**

**maneuvers designed to suit Defendants' immediate arguments, evade obligations, and run out the clock, all of which have directly and substantially prejudiced Plaintiffs' ability to prosecute their case by denying access to essential information for nearly three years.**

Finally, regarding the 30(b)(6) deposition topics outlined in our April 16, 2025 letter, your continued failure to identify designated witnesses or confirm availability for a pre-deposition conference is unacceptable. If this information is not received by close of business **Monday, May 19, 2025**, it will be an additional basis for compelled relief.

Defendants' April 10, 2025, statement was a clear signal of their intent to obstruct. Their subsequent actions, including the latest round of deficient responses and your May 14 email, confirm this strategy. Plaintiffs will now seek relief from this Court under Rule 37 to compel full compliance, preclude untimely objections, and obtain sanctions for this protracted and egregious bad-faith conduct.

Best Regard,

David Samuel

[Quoted text hidden]

David Samuel  
Sydney Roberts  
108 Rinetti Way Rio Linda, CA 95673  
[home@possiblymaybe.com](mailto:home@possiblymaybe.com)

May 12, 2025

VIA EMAIL

Edward Garson  
Monica Castillo  
Wilson Elser Moskowitz Edelman & Dicker LLP  
[Edward.Garson@wilsonelser.com](mailto:Edward.Garson@wilsonelser.com)  
[Monica.Castillo@wilsonelser.com](mailto:Monica.Castillo@wilsonelser.com)

**Re: Request for Discovery Conference under Local Rule 251 – Defendants' Pattern of Discovery Obstruction and Refusal to Confer on Rule 30(b)(6) Designees**

Dear Counsel:

We write under Local Rule 251 and the Court's Standing Orders as our formal meet-and-confer effort on the widespread discovery failures outlined below. Plaintiffs have made repeated good-faith efforts to initiate discovery since early 2023. Defendants have consistently delayed, refused to confer, and failed to provide basic discovery. This conduct has prejudiced Plaintiffs and now threatens to block discovery altogether.

**1. Refusal to Confer on Rule 30(b)(6) Topics**

On April 16, 2025, Plaintiffs asked SHRA to identify potential Rule 30(b)(6) designees and confer in good faith about deposition topics. Your May 12, 2025 letter refused entirely, arguing no duty to confer exists without a formal notice. That is incorrect and contradicts Rule 26(f).

Courts in this District encourage pre-deposition cooperation. See U.S. E.E.O.C. v. Thorman & Wright Corp., No. CIV S-07-0047 LKK-GGH, 2009 WL 764466, at \*4 (E.D. Cal. Mar. 19, 2009). See also Papst Licensing GmbH & Co. KG v. Lattice Semiconductor Corp., No. 15-cv-01128-JST, 2016 WL 915196, at \*3 (N.D. Cal. Mar. 4, 2016) (requiring meaningful efforts to identify topics and witnesses before noticing depositions).

The Ninth Circuit agrees that Rule 30(b)(6) is designed to prevent evasive tactics and ensure parties can secure informed, accountable testimony. See Great Am. Ins. Co. of N.Y. v. Vegas Constr. Co., Inc., 251 F.R.D. 534, 538 (D. Nev. 2008).

This level of cooperation promotes efficient discovery and helps avoid unnecessary court involvement. Plaintiffs are seeking resolution without burdening the Court.

**2. Ongoing Pattern of Delay and Non-Response**

On April 12, 2023, Plaintiffs asked to confirm your communication preferences and initiate coordination following reassignment to Judge Calabretta. Further outreach on April 14 and

again on May 11–12, 2023 raised service, scheduling, and discovery concerns. These efforts were ignored. Copies are attached as Exhibits A through C.

On June 5, 2023, Plaintiffs asked if Defendants would agree to engage in discovery without motion practice. No discovery took place in 2023. SHRA did not initiate disclosures or respond.

Beginning in early 2024, Plaintiffs requested a Rule 26(f) conference and proposed a joint report. Defendants responded that the prior scheduling order made Rule 26(f) unnecessary. This position lacks merit and was preserved for sanctions briefing. At no point in 2024 did Defendants serve disclosures, propose a schedule, or initiate discovery.

On April 3 and April 8, 2025, Plaintiffs served Interrogatories, RFAs, and RFPs. Defendants requested and received an extension. On May 12, 2025, they served only blanket objections and denials. No Bates-stamped documents were produced. No privilege log was provided. Every interrogatory was refused. Every RFA was denied.

This violates Rules 33(b)(2), 34(b)(2)(B), 36(a)(4), and 26(g). It confirms a pattern of obstruction.

Defendants further assert that the 2024 status conference satisfied their Rule 26(f) obligations. This is incorrect and conflicts with Local Rule 251.

### 3. Failure to Identify Key SHRA Personnel and Decision-Makers

SHRA has refused to identify who reviewed or decided Plaintiffs' reasonable accommodation requests or RFTA submissions. Plaintiffs requested a full list of Reasonable Accommodation Committee (RACC) members and staff roles. Defendants have not provided it. This violates Rule 26(a)(1)(A)(i).

Plaintiffs are willing to begin with names of staff who directly handled their case. A full list should follow without delay.

### 4. Withholding of Reasonable Accommodation Records

SHRA has not produced documents related to the July 2022, November 2022, and April 2023 reasonable accommodation requests. This includes case notes, internal emails, or any proof of individualized review. No interactive process records have been produced. These documents are required under the ADA and Section 504.

This violates Rule 34(b)(2)(B), which requires specific responses and either production or valid objection.

### 5. Failure to Produce Internal Policy and Procedure Materials

Plaintiffs requested internal policies regarding RFTA processing, affordability analysis, and RA procedures. SHRA has produced nothing. These documents are central to the case and necessary to evaluate whether SHRA followed its own rules. Production is proportional to the needs of the case under Rule 26(b)(1).

### 6. Refusal to Respond to Core Discovery Requests

Every interrogatory, RFA, and RFP was met with blanket objections. No facts were disclosed. SHRA claims it cannot reach key witnesses it still represents. It has not produced documents it previously promised. No privilege log was served. This obstructs deposition preparation and summary judgment briefing.

This conduct violates Rules 33, 34, 36, and 26(g) and supports sanctions under Rule 37.

#### 7. Prejudice and Request for Judicial Relief

Defendants' delay strategy risks running out the clock. No depositions have taken place. Expert work cannot proceed. Summary judgment cannot be opposed without core documents.

#### 8. Pattern of False Denials and Evasive Tactics

SHRA's May 12 responses include denials that contradict the record. MaryLiz Paulson denied signing denial letters, though her signature appears on all three. Troy Lynch denied attending a hearing where he appears on video. Defendants deny receiving emails they were directly copied on.

SHRA also claims it cannot contact Cruz, Brown, or Henley while continuing to represent them. These evasions violate Rules 26(g) and 36(a)(4).

#### 9. Failure to Preserve Testimony and Custodial Access

Defendants now claim they cannot obtain discovery responses from multiple named individuals, including Cruz, Brown, and Henley, because they are no longer employed by SHRA. This is the first time Plaintiffs have been informed of any such separation. No information has been provided regarding when these individuals left SHRA, under what circumstances, or whether any effort was made to preserve their records or coordinate timely discovery responses. To date, there is no indication that Defendants ever contacted them.

This omission is significant. All three individuals are key witnesses with firsthand knowledge of Plaintiffs' accommodation requests and hearing access barriers. Defendants had numerous opportunities to disclose their employment status or initiate a preservation process. Their failure to do so while simultaneously refusing to engage in discovery until after summary judgment briefing appears deliberate.

By failing to secure discovery from parties under their control, Defendants have increased Plaintiffs' burden and prejudiced the search for truth. These facts support a broader spoliation and bad-faith inference under Rule 37(e), and Plaintiffs reserve the right to seek sanctions, evidentiary preclusion, or adverse instructions accordingly.

Accordingly, Plaintiffs request that Defendants confirm by May 15, 2025 whether they intend to supplement these responses and bring discovery into compliance. If not, Plaintiffs will file a motion to compel, request sanctions under Rule 37(a)(5), and seek a discovery extension. Plaintiffs further intend to submit a proposed order with that motion, which may include adverse inference instructions concerning Defendants' denials, failure to preserve records, and failure to respond to relevant inquiries under oath.



Plaintiffs also formally demand that SHRA preserve all evidence related to this matter, including but not limited to: internal communications regarding Plaintiffs' requests, emails and records maintained by Cruz, Brown, Henley, and Paulson, recordings or transcripts of hearings and attempted hearings, Reasonable Accommodation Committee logs or summaries, and voicemail records from the RA hotline. Failure to preserve this information may result in a separate motion under Rule 37(e).

Should these issues remain unresolved, Plaintiffs are prepared to request an immediate discovery conference with Magistrate Judge Claire under Local Rule 251.

Best Regards,

David Samuel  
Sydney Roberts

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CASE NUMBER

2:22-cv-01699-DJC AC

PLAINTIFF(S),

v.

DEFENDANT(S).

**PROOF OF SERVICE - ACKNOWLEDGMENT  
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I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of \_\_\_\_\_, State of California, and not a party to the above-entitled cause. On \_\_\_\_\_, 20\_\_\_\_\_, I served a true copy of

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following: (list names and addresses for person(s) served. Attach additional pages if necessary.)

Place of Mailing: \_\_\_\_\_

Executed on \_\_\_\_\_, 20\_\_\_\_\_ at \_\_\_\_\_, California

Please check one of these boxes if service is made by mail:

- ☐ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.
- ☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
- ☐ I hereby certify under the penalty of perjury that the foregoing is true and correct.

Barbara McGarvey

*Signature of Person Making Service*

**ACKNOWLEDGEMENT OF SERVICE**

I, \_\_\_\_\_, received a true copy of the within document on \_\_\_\_\_.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Party Served*