



April 1, 2015

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On 2-24-15 I emailed him a copy of the 7-day Notice that was served to the tenant (1 file/attachment)

On 3-7-15 all pictures taken at inception of tenancy (3 files) were emailed.

On 3-16-15 this case was filed against me, Counterclaims and Request for Documents, Admissions and Answers.

On 3-17-15 in response I further emailed the 2014 texts (1 file), Sub-meter Authorization (1 file), Certificate of Occupancy (1 file), 4 of her bad checks (4 files), an old 14-day Notice served on her (1 file), the Thermostat manual (1 file), a video taken at the inception of tenancy (1 file) PLUS My Admissions, My Documents and My Answers.

This is everything I have except I had missed to send him a copy of the Security Deposit passbook which I emailed on 4-1-15.

It seems to me they are complaining that they received too much ("document dumping") while at the same time complaining that they received too little (Motion to Compel). They want to have it both ways.

I have provided everything I have that is even remotely related to this tenant and this case.

Most of my answers to his Document production request and his Interrogatories were simply "already emailed" or "already provided" because they were...already emailed and already provided by me.

I object to all those demands that were overly-broad and unrelated like the request for a review of all notices (texts?) from all tenants who lived in this 6-unit building over the past 5 years, all mortgages, notes, refinance agreements, purchase and sales agreements, brokers agreements, etc.

Most of my Admissions were simple "yes" or "no" answers based on the type of Admissions I was asked to make unless the question required more than a "yes" or "no" answer. For example, I gave a very detailed full page answer to question 8 because I felt it could not be just answered with a "yes" or a "no". I am sorry that the tenant's attorney does not like my answers and admissions but that's what they are.

In conclusion, there is no need for a Motion to Compel because he has received about 30 email attachments from me, that is 272 pictures, 1 video and 124 pages of Discovery that was provided to him.

On the other hand, I made my own Discovery Requests over email on 3-20-15, the 10 days passed without *anything* being given to me. No witnesses, no evidence they may have and may want to present at trial, no documents, nothing...

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I, Elmir Simov, under the pains and penalties of perjury, certify that this Motion was served to Defendant's attorney today, 4/1/2015 via email.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elm Simov". The signature is written in a cursive, flowing style.

Elmir Simov, Cell Phone # 978-853-7843