

**DISTRICT OF COLUMBIA
OFFICE OF ADMINISTRATIVE HEARINGS**

<p>HARRY GURAL <i>Tenant/Petitioner,</i></p> <p style="text-align:center">v.</p> <p>EQUITY RESIDENTIAL MANAGEMENT and SMITH PROPERTY HOLDINGS VAN NESS LP <i>Housing Provider/Respondent</i></p>	<p>2016-DHCD-TP 30,855</p> <p><i>In re:</i> 3003 Van Ness St. NW, S-707</p> <p>Chief Judge M. Colleen Currie</p>
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TENANT’S REQUEST TO HOUSING PROVIDER FOR PRODUCTION OF DOCUMENTS

As granted in the Court’s order of October 17, 2023, the Tenant hereby requests that Housing Providers produce the following documents:

Any document, email, or information in any other digital or printed form, held by Housing Provider, containing the words "Harry Gural" or "Gural" and dated prior to August 30, 2016.

DEFINITIONS

- A. As used herein, a “document,” includes everything listed in Super. Ct. Civ. R. 34(a)(1).
- B. The term “Housing Provider” refers to Equity Residential / Smith Property Holdings Van Ness LP, and includes, without limitation, all agents, partners, members, owners, or employees of Equity Residential / Smith Property Holdings Van Ness LP.
- C. All other terms shall have their standard meanings, unless provided otherwise. If you encounter any ambiguity or are confused by any of the Interrogatories, please identify the portion of the interrogatory which is unclear, answer to the best of your ability, and list any assumption(s) used in responding.

INSTRUCTIONS

- A. The documents and your responses to these requests shall be sent via email to Harry Gural at harrygural@gmail.com.
- B. Documents shall be produced in the manner they are kept in the usual course of business.
- C. These Requests encompass all items within your possession, custody or control.
- D. These Requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information. If you discover responsive documents at a later date, or if responsive documents come into existence at a later date, you must produce them. Tenant is under no obligation to ask again.
- E. If you decline to produce documents pursuant to a claimed privilege, work product immunity, or based on some other objection, you shall list all such documents in chronological order, setting forth as to each document the following:
 - 1) Date
 - 2) Author(s)
 - 3) Addressee(s)
 - 4) Title
 - 5) Type of document
 - 6) Subject matter
 - 7) Basis for the claimed privilege or objection
 - 8) Identity of all persons to whom copies of such documents were sent or circulated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Gural', with a stylized flourish at the end.

HARRY GURAL

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Tenant's Request to Housing Provider for Production of Documents was served on this 4th day of December, 2023, by email upon:

Richard W. Luchs (D.C. Bar No. 243931)
Spencer B. Ritchie (D.C. Bar No. 167352)
Greenstein, DeLorme and Luchs
801 17th Street, N.W., Suite 1000
Washington, DC 20006-3967



Dec. 4, 2023

Harry Gural
Tenant/Petitioner, *pro se*

3003 Van Ness St, NW #S-707
Washington, DC 20008