

**Remote Deposition of: Santos Cruz,
PMK for Green Horizons Landscape & Maintenance, Inc.**

**Jill Mann vs. Las Brisas Pacificas, Inc.
February 5, 2026**



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THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

JILL MANN, an individual,)
)
 Plaintiff,)
)
 vs.) Case No.24CU015304N
)
)
 LAS BRISAS PACIFICAS, INC., a)
 California mutual benefit)
 common interest development)
 corporation; and DOES 1-20,)
 inclusive,)
)
 Defendants.)
 _____)

REMOTE DEPOSITION OF SANTOS CRUZ,
PERSON MOST KNOWLEDGEABLE FOR GREEN HORIZONS
LANDSCAPE & MAINTENANCE, INC.
Thursday, February 5, 2026

Reported by: Natalie Simon, CSR No. 14375
Job No. 128614

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JILL MANN, an individual,)
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LAS BRISAS PACIFICAS, INC., a)
California mutual benefit)
common interest development)
corporation; and DOES 1-20,)
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Defendants.)
_____)

The remote deposition of SANTOS CRUZ, PERSON MOST
KNOWLEDGEABLE FOR GREEN HORIZONS LANDSCAPE &
MAINTENANCE, INC., taken on behalf of the Plaintiff,
before Natalie Simon, Certified Shorthand Reporter
14375, for the State of California, commencing at
11:18 a.m., Thursday, February 5, 2026, via
videoconference, Placentia, California.

1 APPEARANCES:

2

3 For the Plaintiff:

4 LS CARLSON LAW
5 A PROFESSIONAL LAW CORPORATION
6 By: Vasko C. Alexander, Esq.
7 Attorney at Law
8 85 Enterprise, Suite 310
9 Aliso Viejo, California 92656
10 T: 949-421-3030
11 E: valexander@lscarlsonlaw.com

12 For the Defendants:

13 WASSERMAN KORNHEISER COMBS LLP
14 By: Trish M. Jones, Esq.
15 Attorney at Law
16 7955 Raytheon Road, Suite A
17 San Diego, California 92111
18 T: 858-505-9500
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20

21

22 ALSO PRESENT:

23 JOY CHIDGEY

24 GELA ALAYVILLA

25 OMAR TRINIDAD

JILL MANN

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I N D E X

WITNESS

SANTOS CRUZ, PMK

EXAMINATION

PAGE

BY MR. ALEXANDER

6

INFORMATION REQUESTED:

(NONE.)

WITNESS INSTRUCTED NOT TO ANSWER:

(NONE.)

QUESTIONS MARKED:

(NONE.)

INDEX FOR EXHIBITS

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1 Thursday, February 5, 2026, 11:18 a.m.

2
3
4 THE STENOGRAPHIC REPORTER: Good morning. My
5 name is Natalie Simon. I am a California Certified
6 Shorthand Reporter and the deposition officer for
7 today's deposition. My CSR license number is 14375.

8
9 SANTOS CRUZ - PERSON MOST KNOWLEDGEABLE FOR GREEN HORIZONS
10 LANDSCAPE & MAINTENANCE, INC.,
11 was called as a witness by and on behalf of the
12 Plaintiff, and having been first duly sworn by the
13 Certified Shorthand Reporter, was examined and testified
14 as follows:

15 -o0o-

16 EXAMINATION

17 BY MR. ALEXANDER:

18 Q Mr. Cruz, how are you?

19 A Good. Thank you.

20 Q Okay. So you saw session one. Nothing too
21 terrible; right? Okay. Maybe there is some
22 disagreement. I don't know. Okay. We know each other
23 now. Vasko Alexander for plaintiff. We previously
24 marked Exhibit 1 which was the deposition subpoena,
25 which I have up on my screen now. And you heard Omar

1 identify you as the person most knowledgeable in certain
2 categories.

3 And just for the record, and I am going to
4 back and state that you were previously identified as
5 the PMK, as we call you, on Category 6; correct?

6 A Yes.

7 Q Do you agree that you are the person most
8 qualified or knowledgeable with respect to Category 6,
9 communication with the associate about the plaintiff's
10 property and the slope?

11 A Yes.

12 Q Okay. And Category No. 8, discovery of the
13 incident?

14 A Yes.

15 Q And Category No. 9, irrigation and drainage
16 decisions after the incident?

17 A Yes.

18 Q Okay. Do you need me to go over the same
19 admonitions that I did with Omar, or are you comfortable
20 proceeding without them?

21 A Can you repeat again?

22 Q Sure. Do you need the admonitions that I gave
23 to Omar about how the deposition is going to be
24 conducted? Or are you comfortable with proceeding
25 without them considering you were in the room when I

1 gave those admonitions to Omar?

2 A Very good.

3 Q I am sorry. I did not hear your response.

4 A Yeah, I didn't understand -- really understand
5 your question.

6 Q Okay. Let's just go over the admonitions very
7 briefly here. Let's continue doing what we are doing.
8 You wait for my question before you provide me with a
9 response.

10 Does that sound fair?

11 A Okay.

12 Q If I am not clear on a question, ask me to
13 clarify; and I will be happy to do so. Okay?

14 A Okay.

15 Q Verbal responses only. No body language. No
16 "huh-uhs" or "uh-huhs."

17 Does that sound fair?

18 A Okay.

19 Q Do you understand the difference between a
20 guess and an estimate?

21 A Yes.

22 Q Are you under the influence of any substance
23 that would allow you -- that would prevent you from
24 providing us your best testimony today?

25 A No.

1 Q Have you been deposed before?

2 A Yes.

3 Q And what was -- when were you deposed?

4 A I can't remember the years. Probably, like,
5 four or five years ago.

6 Q Okay. And how many times have you been
7 deposed?

8 A Just one.

9 Q Just once. Okay.

10 What was the scope of the deposition? Why
11 were you deposed?

12 A Probably just one property.

13 Q Was it related to a maintenance of a HOA
14 property?

15 A No.

16 Q Okay. Were you deposed in individual capacity
17 or as the person most knowledgeable for --

18 A Can you say that again, please?

19 Q Sure. Sure.

20 Were you offering testimony on behalf of a
21 company or in your personal capacity?

22 A No, a company.

23 Q Oh, okay.

24 Was it behalf of Green Horizons?

25 A Yes.

1 Q I see.

2 And what was the case about?

3 A Where?

4 Q What was the case about that you were deposed
5 on?

6 A About a tree problem.

7 Q What were the problems with the property in
8 that case?

9 A In the past, when I, you know, some roots.
10 There was under -- the house or the building.

11 Q I have to admit I was not able to understand
12 what you just said.

13 A Some roots problem. Tree roots.

14 Q Oh, tree roots. Okay.

15 A Uh-huh.

16 Q Does that case go to trial?

17 A No -- I didn't know.

18 Q Okay. Have you ever offered trial
19 deposition -- trial testimony?

20 A No.

21 Q And you are currently employee by Green
22 Horizons; correct?

23 A Yes.

24 Q When were you first employed by Green
25 Horizons?

1 A 1985.

2 Q And what was your first position with Green
3 Horizons?

4 A A labor.

5 Q Okay. And how long did you hold that
6 position?

7 A For like three years.

8 Q In '88, how did your position title change?

9 A You know, step to fore man after three years
10 labor.

11 Q And how about foreman in 1991, how did your
12 position change?

13 A To supervisor.

14 Q Okay. And what was your next position?

15 A Superintendent.

16 Q Well, how long were you a supervisor for?

17 A Pretty much -- probably like, let's say, maybe
18 20 years.

19 Q 20 years?

20 A Uh-huh.

21 Q Okay. And are you currently a superintendent?

22 A Yes.

23 Q Okay. What are your duties as a
24 superintendent?

25 A Work with -- work with everyone. Make sure

1 everything is going good.

2 Q How many properties do you supervisor as a
3 superintendent?

4 A I am supervising, you know, probably like 50,
5 51. Around 51 properties.

6 Q 5-1?

7 A Between me and Omar.

8 Q Okay. Is Omar your right-hand man on this?

9 A Yes.

10 Q Not just because he is sitting to your right?

11 A Yeah, he is.

12 Q He does all the work. I know already. Look
13 at him.

14 A Yeah, he does the work.

15 Q All right. Safe to say that you also
16 supervise work performed at Las Brisas; correct?

17 A Yes.

18 Q Okay. With respect to Category No. 6, which
19 is communications with the associate about plaintiff's
20 property, have you -- has Green Horizons specifically
21 communicated with the HOA regarding Lot 139?

22 A Yes.

23 Q And what -- what do those communication
24 consist of?

25 A You know, saying that they are going to the

1 office before, you know, to the office.

2 Q And those are reports telephonic, or e-mail,
3 or text message? How are those reports made?

4 A E-mail and called.

5 Q And how are the e-mails stored? Is it in a
6 e-mail account --

7 A E-mail.

8 Q Now, the company has produced only two
9 documents in response to my document subpoena.

10 Is there a reason why no e-mails were produced
11 by Green Horizons?

12 A I didn't understand your question.

13 Q Okay. Let's go back to Exhibit 2. I had
14 requested documents, including communications, that
15 relate to any service that Green Horizons has performed
16 for the association during the subject period. And the
17 subject period is defined as May 3, 1991 through
18 current; however, those documents were not produced to
19 my office.

20 Is there any reason why those documents were
21 not produced?

22 A No idea.

23 Q When Green Horizons received this document
24 subpoena, did it contact any attorney to discuss this
25 with them?

1 A Yes.

2 Q Do you know who Ms. Jones is?

3 A No.

4 Q Do you know -- well if you don't know who she
5 is, you probably don't know what law firm she works for.

6 Do you -- are you representative by counsel
7 today?

8 A Excuse me?

9 Q Yeah. Are you represented by counsel today?

10 A Yes -- no. No. No. No. No.

11 Q Oh, you are not? You are not. Okay.

12 Do you have an understanding of who the law
13 firm of Wasserman Kornheiser Combs is?

14 A No.

15 Q Does the name Craig Combs mean anything to
16 you?

17 A No.

18 Q So when you received the document subpoena and
19 Green Horizons contacted an attorney, it was not the
20 office of Craig Combs; correct?

21 A No.

22 Q Okay. So there was a different law firm;
23 correct?

24 A Say again?

25 Q Was there a different law firm that Green

1 Horizons contacted when it it received the subpoena,
2 which is Exhibit 2?

3 A I don't know.

4 Q You don't know? Okay. That is a fair
5 response.

6 Are there any communications or any documents
7 that include communications that relate to the work that
8 Green Horizons has performed for the association during
9 the subject time period in Green Horizons custody or
10 control?

11 A Yes.

12 Q Okay. I am going to ask you to produce those
13 after your deposition? Okay. I will e-mail Gela on
14 that, specifically.

15 A Yes.

16 Q Now, with respect to the discovery of the
17 incident, you understand what incident we are talking
18 about; correct?

19 A Yes.

20 Q And is that is the April 28, 2023, failure of
21 the slope at 139; correct?

22 A Yes.

23 Q How did you come to understand that there was
24 a slope failure at that location?

25 A I got -- we got the report for the on-site --

1 on-site foreman about the crack behind Lot 139.

2 Q And was that Luis?

3 A Luis Trinidad.

4 Q And what did Luis say to you?

5 A Yeah. He pretty much -- he called me. And he
6 say "I find, you know, a crack behind that Lot 139. Can
7 you stop by and check?"

8 Q Did, at that time, Green Horizons contact the
9 HOA to report the failure of the slope?

10 A Yes. I reported it the same day.

11 Q Okay. Did Green Horizons offer an opinion as
12 to what may have caused the slope failure?

13 A No.

14 Q Did the HOA indicate to Green Horizons what it
15 thought might have caused the slope failure?

16 A No.

17 Q Do you have an understanding, as you sit here
18 today, what caused the slope failure?

19 A Yes -- no.

20 Q What is your understanding of that?

21 A No understanding.

22 Q Oh, you don't. Okay. I misheard you. I
23 apologize.

24 What has been the irrigation schedule at 139
25 post-slope failure? Has there been an adjustment of the

1 irrigation?

2 A Before.

3 Q Well, after the irrigate- -- after the slope
4 failure?

5 A After, adjusted.

6 Q And how was it adjusted?

7 A By the control.

8 Q Okay.

9 A By the irrigation control.

10 Q Who -- who instructed Green Horizons to make
11 that adjustment?

12 A You know, we decided, you know, we need a
13 little bit more time -- we go over there to make sure
14 the plants are still alive. Not overwatered --

15 Q Yeah. What plants are you referring to?

16 A What excuse me?

17 Q What plants are you referring to?

18 A What plants?

19 Q Yeah.

20 A No. Ground cover. Different shrubs on the
21 slope.

22 Q Okay. Okay.

23 You heard Mr. Omar's testimony with respect to
24 the irrigation system at Lot 139; correct?

25 A Yes.

1 Q Do you disagree with any of his testimony?

2 A No.

3 Q Do you disagree with any of his testimony with
4 respect to anything else?

5 A No.

6 Q Thank you, sir. Those are all the questions I
7 have for you?

8 THE STENOGRAPHIC REPORTER: Ms. Jones, did you
9 have any questions? Oh, you are muted.

10 MS. JONES: No, I don't know. Thank you.

11 THE STENOGRAPHIC REPORTER: And did you need a
12 copy of either of the transcripts today?

13 MS. JONES: Yes, please. Both.

14 (Whereupon, at 11:35 a.m., the deposition of
15 Santos Cruz-Person Most Knowledgeable for
16 Green Horizons Landscape & Maintenance Inc,
17 was concluded)

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PENALTY OF PERJURY

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I, _____, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this ____ day of _____, 2026,
at _____, _____.
(City) (State)

(WITNESS)

CERTIFICATE

OF

CERTIFIED SHORTHAND REPORTER

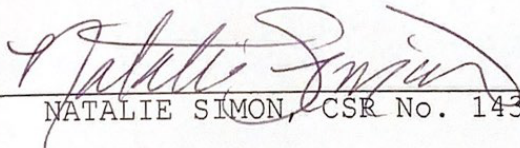
* * * *

The undersigned Certified Shorthand Reporter of the State of California does hereby certify:

That the foregoing Proceeding was taken before me at the time and place therein set forth.

That the testimony and all objections made at the time of the Proceeding were recorded stenographically by me and were thereafter transcribed, said transcript being a true and correct copy of the proceedings thereof.

In witness whereof, I have subscribed my name, this date: February 27, 2026.



NATALIE SIMON, CSR No. 14375