

2723 South State Street. Suite, 150 Ann Arbor MI 48104

Tel: +1 (866) 534 6177 (Toll free)

Email: [support@nora.legal.com](mailto:support@nora.legal.com)

Website: [nora.legal.com](http://nora.legal.com)

[REDACTED]

Attorneys for Plaintiff [REDACTED]

[REDACTED], an individual  
Plaintiff,

vs.

[REDACTED], and DOES 1-10,  
inclusive,  
Defendants.

CASE NO.: [REDACTED]

**REQUEST FOR ADMISSION  
PROPOUNDED BY [REDACTED] -  
SET ONE**

Judge: [REDACTED]  
Dept: [REDACTED]

Date Action Filed: [REDACTED]  
Trial Date: [REDACTED]

SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
COUNTY OF [REDACTED] - CENTRAL JUSTICE CENTER

PROPOUNDING PARTY: [REDACTED]

RESPONDING PARTY: [REDACTED]

SET NO.: ONE

**TO DEFENDANT [REDACTED] AND ITS ATTORNEY OF RECORD:**

Plaintiff [REDACTED] ("Propounding Party") hereby requests that Defendant [REDACTED] ("Responding Party" "[REDACTED]") answer each of the following Requests for Admission under oath and

1 within the time set forth under Section 2033.210 *et seq.* of the *California Code of Civil Procedure*. The  
2 admissions shall be deemed admitted unless timely written responses to each particular inquiry are served  
3 to Plaintiff's counsel at the offices of [REDACTED], Suite [REDACTED], CA [REDACTED].

4 The responses shall specifically admit or deny each requested admission or set forth in detail the  
5 reasons why Responding Party cannot truthfully admit or deny a matter. A denial shall fairly meet the  
6 substance of the specific admission, and if in good faith such denial requires that Responding Party qualify  
7 its answer or deny only a part of a matter in which an admission is requested, then Responding Party shall  
8 specify so much of it as is true and qualify or deny the remainder.

9 Responding Party may not give lack of information or knowledge as a reason for failure to admit  
10 or deny unless it states that reasonable inquiry was made and that after such inquiry the information known  
11 or easily obtainable is insufficient to enable Responding Party to admit or deny the requested admission.

### 12 DEFINITIONS

13  
14 1. The term "PERSON" or "PERSONS" means and includes natural persons, any business  
15 entity, whether a sole proprietorship, limited liability company, partnership, association, firm, joint  
16 venture, or other governmental or public entity and any other legal entity.

17  
18 2. The term "YOU", "YOUR" refers to Defendant [REDACTED], as well as all other PERSONS  
19 acting or purporting to act on behalf of Defendant [REDACTED].

20  
21 3. The term "INCIDENT" means the vehicular collision that YOU were involved in with  
22 PROPOUNDING PARTY on [REDACTED]

23 4. The term referring to YOUR "VEHICLE" means the [REDACTED] license number  
24 [REDACTED] and [REDACTED] number of [REDACTED].

### 25 REQUESTS FOR ADMISSIONS

#### 26 REQUEST FOR ADMISSION NO. 1:

1 Admit that YOU were [REDACTED] in which [REDACTED] was a [REDACTED] r in YOUR  
2 [REDACTED] e on or about [REDACTED].

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

4 Admit that YOU were driving YOUR [REDACTED] in which [REDACTED] was a  
5 passenger on or about [REDACTED].

6 **REQUEST FOR ADMISSION NO. 3:**

7 Admit that [REDACTED] suffered injuries as the proximate result of a [REDACTED] on or  
8 about [REDACTED].

9 **REQUEST FOR ADMISSION NO. 4:**

10 Admit that a [REDACTED] license [REDACTED] [REDACTED] involved in the INCIDENT on  
11 [REDACTED].

12 **REQUEST FOR ADMISSION NO. 5:**

13 Admit that on [REDACTED], YOU were [REDACTED] license [REDACTED].

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

15 Admit that YOU are the owner of the [REDACTED].

16 **REQUEST FOR ADMISSION NO. 7:**

17 Admit that when the INCIDENT happened, YOU were [REDACTED] [REDACTED] in the designated  
18 left turn lane at or near the [REDACTED] [REDACTED].

19 **REQUEST FOR ADMISSION NO. 8:**

20 Admit that YOU did not have [REDACTED].

21 **REQUEST FOR ADMISSION NO. 9:**

22 Admit that YOUR negligence was the proximate cause for the injuries sustained by [REDACTED].

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

1 Admit that the accident on [REDACTED] was caused because YOU failed to y [REDACTED]  
2 [REDACTED] while making [REDACTED] from [REDACTED] Street  
3 while [REDACTED] was [REDACTED] in YOUR [REDACTED].

4 **REQUEST FOR ADMISSION NO. 11:**

5 Admit that YOU failed [REDACTED] of YOUR [REDACTED] the  
6 time of the INCIDENT.

7 **REQUEST FOR ADMISSION NO. 12:**

8 Admit that YOU caused the collision with [REDACTED] in the aforesaid [REDACTED] on  
9 [REDACTED].

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

11 Admit that YOU have no evidence that [REDACTED]  
12 [REDACTED] that were involved in the INCIDENT caused or contributed to the [REDACTED].

13 **REQUEST FOR ADMISSION NO. 14:**

14 Admit that YOU have no evidence that [REDACTED] [REDACTED] caused or contributed to  
15 the subject [REDACTED].

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

17 Admit that at the time of the INCIDENT, there were no unusual [REDACTED].

18 **REQUEST FOR ADMISSION NO. 16:**

19 Admit that [REDACTED] of YOUR VEHICLE on  
20 [REDACTED] at the time of the INCIDENT.

21 **REQUEST FOR ADMISSION NO. 17:**

22 Admit that the passenger side of YOUR VEHICLE was where the [REDACTED] occurred on [REDACTED]  
23 [REDACTED].

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

1 Admit that as a result of the collision on [REDACTED], [REDACTED] experienced personal injuries  
2 that required medical attention and treatment.

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

4 Admit that the attached police incident report is a true and correct copy of the police report from the  
5 **INCIDENT.**

6 **REQUEST FOR ADMISSION NO. 20:**

7 Admit that the collision report of the crash related to the **INCIDENT** states that **YOU** were [REDACTED]  
8 [REDACTED] in violation of [REDACTED] Section [REDACTED]

9 **REQUEST FOR ADMISSION NO. 19:**

10 Admit that Plaintiff was a [REDACTED] at the time of the **INCIDENT** when [REDACTED] was [REDACTED]  
11 [REDACTED] of **YOUR** vehicle.  
12

13  
14 Dated: [REDACTED] [REDACTED]

15  
16  
17 By: \_\_\_\_\_  
18 [REDACTED]  
19 [REDACTED]  
20 Attorneys for Plaintiff [REDACTED]

## PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF [REDACTED]

I am employed in the County of [REDACTED], State of California. I am over the age of 18 and not a party to the within action; my business address is [REDACTED], [REDACTED], CA [REDACTED]. On [REDACTED], I served the foregoing document described as PLAINTIFF'S RESPONSE TO FIRST SET OF REQUESTS FOR ADMISSION on the interested parties:

[REDACTED]	Attorney for Defendant [REDACTED]
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BY MAIL: I caused such document(s) to be placed in a sealed envelope and delivered by U.S. Mail to the offices of the addressees on the attached Service List following ordinary business practices. 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 the same day with postage thereon fully prepaid at [REDACTED] in the ordinary course of business. I am aware that on motion of the party sewed, 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 FACSIMILE: I caused such document(s) to be transmitted by facsimile to the offices of the addressees on the attached Service List following ordinary business practices.

BY PERSONAL SERVICE: I caused such document(s) to be personally served to the addressees on the attached Service List following ordinary business practices.

STATE: I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

2  
3 Executed on [REDACTED], at [REDACTED], California.

4  
5 By: \_\_\_\_\_  
6 [REDACTED]