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5 **Attorneys for Plaintiff,**  
6 **[CLIENT'S NAME(S)]**

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF [COUNTY], [DISTRICT]**

10 **[PLAINTIFF(S)]**, an individual,  
11 Plaintiff,  
vs.

12 **[DEFENDANT(S)]**, and DOES 1 to **[#]**,  
13 inclusive,  
14 Defendants.

Case No. [ ]  
Honorable [ ]  
[Dept. [#]]

**PLAINTIFF'S REQUEST FOR  
ADMISSIONS, SET ONE**

Action Filed: [ ]  
Trial Date: [ ]

16 PROPOUNDING PARTY : PLAINTIFF **[CLIENT'S NAME]**  
17 RESPONDING PARTY : DEFENDANT **[DEFENDANT'S NAME]**  
SET NUMBER : TWO

18  
19 Plaintiff **[CLIENT'S NAME]** ("PLAINTIFF") requests that Defendant  
20 **[DEFENDANT'S NAME]** ("DEFENDANT") answer fully the following set of Request for  
21 Admissions, in writing and under oath, pursuant to California Code of Civil Procedure  
22 Section 2033.010, and that said answers be signed, verified, and served within thirty (30)  
23 days after service is made upon you. Please be cautioned that if you deny any matters upon  
24 which admissions are sought and plaintiff is able to prove the truth thereof, California Code  
25 of Civil Procedure Section 2033.010 permits plaintiff to apply to the Court for an order that  
26 defendant pay to Plaintiff the reasonable expenses incurred in making such proof.

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1 **DEFINITIONS**

2 A. “DEFENDANT,” “YOU” and “YOUR” shall mean Defendant  
3 [DEFENDANT’S NAME].

4 B. “PLAINTIFF” shall mean PLAINTIFF [CLIENT’S NAME].

5 C. “SUBJECT INCIDENT” means and refers to the incident on [DATE OF  
6 INCIDENT] described in PLAINTIFF’s Complaint upon which this suit is founded.

7 **REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that YOU were negligent at the time of the SUBJECT INCIDENT.

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

11 Admit that YOUR negligence was the proximate cause of the SUBJECT INCIDENT.

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

13 Admit that PLAINTIFF was not negligent in causing the SUBJECT INCIDENT.

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

15 Admit that there is no evidence that PLAINTIFF committed any negligent acts that  
16 contributed to causing the SUBJECT INCIDENT.

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

18 Admit that there is no evidence that PLAINTIFF committed any negligent omissions that  
19 contributed to causing the SUBJECT INCIDENT.

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

21 Admit that YOU were not looking in the direction YOU were traveling at the time of the  
22 SUBJECT INCIDENT.

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

24 Admit that immediately prior to impact, the vehicle operated by PLAINTIFF was lawfully  
25 in PLAINTIFF’s lane at the time of the SUBJECT INCIDENT.

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

27 Admit that the front of the vehicle YOU were operating struck the vehicle the PLAINTIFF  
28 was operating on the date of the SUBJECT INCIDENT.

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

2 Admit that PLAINTIFF did not contribute to the cause of the SUBJECT INCIDENT.

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

4 Admit that the vehicle that YOU were driving struck the PLAINTIFF's vehicle on the date  
5 of the SUBJECT INCIDENT.

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

7 Admit that had YOU been driving at a slower speed, YOU would have avoided striking the  
8 PLAINTIFF's vehicle on the date of the SUBJECT INCIDENT.

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

10 Admit that YOUR actions were the sole cause of the SUBJECT INCIDENT.

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

12 Admit that no other entity contributed to cause the SUBJECT INCIDENT.

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

14 Admit that significant injury can occur in a motor vehicle accident.

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

16 Admit that PLAINTIFF was injured as a result of the SUBJECT INCIDENT.

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

18 Admit that PLAINTIFF was caused to suffer various injuries as a result of the SUBJECT  
19 INCIDENT.

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

21 Admit that PLAINTIFF was injured as a result of the SUBJECT INCIDENT caused by  
22 YOU.

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

24 Admit that YOU have no evidence to support the affirmative defense that the PLAINTIFF  
25 assumed the risk of PLAINTIFF'S injuries.

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

27 Admit that YOU have no evidence to support the affirmative defense that the PLAINTIFF  
28 was contributorily negligent.

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

2 Admit that The PLAINTIFF did sustain injuries as a result of the accident which took place  
3 on the date of the SUBJECT INCIDENT.

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

5 Admit that The PLAINTIFF did require necessary medical treatment as a result of the  
6 SUBJECT INCIDENT.

7 **REQUEST FOR ADMISSION NO. 22:**

8 Admit that the medical treatment rendered was medically necessary as a result of the  
9 SUBJECT INCIDENT complained of in the PLAINTIFF's Complaint.

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

11 Admit that the medical treatment rendered was causally related to the SUBJECT INCIDENT  
12 complained of in the PLAINTIFF's Complaint.

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

14 Admit that the medical bills were reasonable regarding the treatment rendered for the  
15 SUBJECT INCIDENT complained of in the PLAINTIFF's Complaint.

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

17 Admit that YOU did not see PLAINTIFF'S vehicle at any time prior to the collision.

18 **REQUEST FOR ADMISSION NO. 26:**

19 Admit that YOU did not see PLAINTIFF at any time prior to the SUBJECT INCIDENT.  
20

21 DATED: May 23, 2018

**SELARZ LAW CORP.**

23 By: \_\_\_\_\_

24 Daniel E. Selarz, Esq.  
25 **Attorneys for Plaintiff(s),**  
26 **[Client's Name(s)]**

28

**PROOF OF SERVICE**

Case No. [REDACTED]

I, the undersigned, declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 23, 2018 I served the foregoing document(s) **PLAINTIFF'S REQUEST FOR ADMISSIONS, SET ONE** to the following party(ies) in this action addressed as follows:

**PLEASE SEE ATTACHED SERVICE LIST**

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 23, 2018, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

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Daniel E. Selarz

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**SERVICE LIST**

SENT VIA U.S. MAIL

[Attorney's Name]  
[Law Firm Name]  
[Street Address]  
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx  
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]