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1 SELARZ LAW CORP.
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5 **Attorneys for Plaintiff,**
[CLIENT'S NAME(S)]

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

10 [PLAINTIFF(S)], an individual,
11 Plaintiff,
12 vs.
13 [DEFENDANT(S)], and DOES 1 to [#],
14 inclusive,
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 : ONE

18
19 Plaintiff [CLIENT'S NAME] hereby requests that Defendant [DEFENDANT'S
20 NAME] answer the following set of Requests for Admissions, pursuant to California Code
21 of Civil Procedure Section 2033, et seq., and that said responses be signed, verified, and
22 served within thirty (30) days after service.

23 **DEFINITIONS**

- 24 A. "PLAINTIFF" shall mean PLAINTIFF [CLIENT'S NAME].
25 B. "DEFENDANT," "YOU" and "YOUR" shall mean DEFENDANT
26 [DEFENDANT'S NAME].
27 C. "SUBJECT INCIDENT" means and refers to the incident on [Date of
28 Incident], described in PLAINTIFF's Complaint upon which this suit is founded.

1 D. "SUBJECT PREMISES" means and refers to the property on which the
2 SUBJECT INCIDENT occurred, located at [Premises Address].

3 **REQUESTS FOR ADMISSION**

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

5 Admit that YOU owned the SUBJECT PREMISES at the time of the SUBJECT
6 INCIDENT.

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

8 Admit that YOU leased the SUBJECT PREMISES at the time of the SUBJECT
9 INCIDENT.

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

11 Admit that YOU occupied the SUBJECT PREMISES at the time of the SUBJECT
12 INCIDENT.

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

14 Admit that YOU controlled the SUBJECT PREMISES at the time of the SUBJECT
15 INCIDENT.

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

17 Admit that YOU were negligent in the use of the SUBJECT PREMISES at the time
18 of the SUBJECT INCIDENT.

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

20 Admit that YOU were negligent in the maintenance of the SUBJECT PREMISES at
21 the time of the SUBJECT INCIDENT.

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

23 Admit that YOUR negligence was a substantial factor in causing harm to
24 PLAINTIFF.

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

26 Admit that PLAINTIFF suffered damages as a result of the SUBJECT INCIDENT.

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

28 Admit that PLAINTIFF suffered past economic loss as a result of the SUBJECT

1 INCIDENT.

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

3 Admit that PLAINTIFF suffered past lost earnings as a result of the SUBJECT
4 INCIDENT.

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

6 Admit that PLAINTIFF suffered past lost profits as a result of the SUBJECT
7 INCIDENT.

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

9 Admit that PLAINTIFF incurred past medical expenses as a result of the SUBJECT
10 INCIDENT.

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

12 Admit that PLAINTIFF will suffer future economic loss as a result of the SUBJECT
13 INCIDENT.

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

15 Admit that PLAINTIFF will suffer future lost earnings as a result of the SUBJECT
16 INCIDENT.

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

18 Admit that PLAINTIFF will suffer future lost profits as a result of the SUBJECT
19 INCIDENT.

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

21 Admit that PLAINTIFF will incur future medical expenses as a result of the
22 SUBJECT INCIDENT.

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

24 Admit that PLAINTIFF suffered past noncomic loss as a result of the SUBJECT
25 INCIDENT.

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

27 Admit that PLAINTIFF suffered past physical pain as a result of the SUBJECT
28 INCIDENT.

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

2 Admit that PLAINTIFF suffered past mental suffering as a result of the SUBJECT
3 INCIDENT.

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

5 Admit that PLAINTIFF will suffer future noncomic loss as a result of the SUBJECT
6 INCIDENT.

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

8 Admit that PLAINTIFF will suffer future physical pain as a result of the SUBJECT
9 INCIDENT.

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

11 Admit that PLAINTIFF will suffer future mental suffering as a result of the
12 SUBJECT INCIDENT.

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

14 Admit that PLAINTIFF was not negligent at the time of the SUBJECT INCIDENT.

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

16 If you contend that PLAINTIFF was negligent at the time of the SUBJECT
17 INCIDENT, admit that PLAINTIFF's negligence was not a substantial factor in causing
18 PLAINTIFF's harm.

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

20 Admit that no other party to this lawsuit was negligent at the time of the SUBJECT
21 INCIDENT.

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

23 If you contend that another party to this lawsuit was negligent at the time of the
24 SUBJECT INCIDENT, admit that the other party's negligence was not a substantial factor
25 in causing PLAINTIFF's harm.

26 **REQUEST FOR ADMISSION NO. 27:**

27 Admit that no non-party person or entity was negligent at the time of the SUBJECT
28 INCIDENT.

1 **REQUEST FOR ADMISSION NO. 28:**

2 If you contend that a non-party person or entity was negligent at the time of the
3 SUBJECT INCIDENT, admit that the non-party's negligence was not a substantial factor in
4 causing PLAINTIFF's harm.

5
6
7 DATED: May 24, 2020

SELARZ LAW CORP.

8
9 By: _____
10 Daniel E. Selarz, Esq.
11 **Attorneys for Plaintiff(s),**
12 [Client's Name(s)]
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PROOF OF SERVICE

Case No. []

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 24, 2020 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 24, 2020, 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.

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]]