SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

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CLYDE WILSON ) Index No. \_\_\_\_\_\_\_\_

Plaintiff, ) **PLAINTIFF’S**

-against- ) **REQUEST FOR**

CHARLES JACOBS, ) **ADMISSIONS**

Defendant. )

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YOU ARE HEREBY requested to admit or deny the statements contained herein and serve your responses upon PLAINTIFF within thirty days of receipt of these requests pursuant to COURT RULE 36.

DEFINITIONS:

1. COMPLAINT shall mean and refer to Plaintiff’s complaint originally filed on in Department of the New York County District Court.

2. YOU, YOUR, YOURS, and/or PLAINTIFF shall mean and refer to CLYDE WILSON, as well as, his agents, attorneys, employees, accountants, family members, investigators, or any other person acting on his behalf.

REQUEST FOR ADMISSIONS:

1. Admit or deny YOU were familiar with the defendant in a professional capacity as specified in the PLAINTIFF’S COMPLAINT.

2. Admit or deny YOU hired the plaintiff twenty years prior to the date in question (October 22nd, 2018).

3. Admit or deny YOU had a professional relationship with the PLAINTIFF over the aforesaid twenty year period in question as alluded to in Request #2.

4. Admit or deny YOUR personal relationship with the plaintiff was, as the plaintiff alleges, amiable and without blemish up until and including the date of my client’s dismissal from YOUR firm.

5. Admit or deny that, during the duration of PLAINTIFF’S employment at YOUR firm, the PLAINTIFF was well regarded and respected by his co-workers.

5a. Admit or deny that PLAINTIFF’S actions and general attitude were positive contributions to company culture and work synergy as a whole.

6. Admit or deny that during PLAINTIFF’S twenty years of employment at Dice and Jacobs Law, PLAINTIFF was never brought up on any disciplinary action.

7. Admit or deny that during PLAINTIFF’S twenty years of employment at Dice and Jacobs Law, the PLAINTIFF was praised and promoted by his superiors.

7a. Admit or deny that these employment promotions were, on occasion, granted by YOU.

8. Admit or deny that the PLAINTIFF’S position of file clerk is one which PLAINTIFF could successfully effectuate if he were in ill health.

9. Admit or deny that PLAINTIFF’S position of file clerk is one where age is, at best, a trivial factor.

10. Admit or deny that, as far as you were aware, PLAINTIFF was in excellent health on the day YOU dismissed him from YOUR employ (October 22nd, 2018).

11. Admit or deny that YOUR citation of age in the legitimization of PLAINTIFF’S dismissal from employment was YOUR convenient pretext to shoehorn in a younger, cheaper, and more suggestive replacement in PLAINTIFF’S stead.

12. Admit or deny that YOUR dismissal of the PLAINTIFF from his position of employ under the pretext of age violates civil rights law which YOU are bound to obey.

Please note that YOU are required by COURT RULE 36, to file and serve a written response to this request for identification and production within 30 days.

DATED: May 30th, 2019.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Eric Komar, Paralegal to John Disraeli, Attorney for Plaintiff,

CERTIFICATE OF MAILING

I hereby certify that on this 30th day of May, 2019, I placed a true and correct copy of the foregoing REQUEST FOR ADMISSIONS in the United States Mail, postage prepaid, addressed to counsel on the attached service list. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_