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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES - CENTRAL DISTRICT - UNLIMITED

KENNETH KLOTZLE , an individual;

Plaintiff,

vs.

EMIL JAQUIAS, JOSE ZAGO AND SUSANA  
ZAGO ; Does 1 TO 10, Inclusive,

Defendants.

Case No. 22STCV06411

**PLAINTIFF'S RESPONSES TO REQUEST FOR  
ADMISSIONS**

PROPOUNDING PARTY: Defendant, EMIL JAQUIAS, JOSE ZAGO AND SUSANA ZAGO

RESPONDING PARTY: Plaintiff, KENNETH KLOTZLE

SET NUMBER: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLAINTIFF, KENNETH KLOTZLE , (hereinafter "Responding Party") makes the following  
answers and objections to the REQUEST FOR ADMISSIONS , Set One.

PRELIMINARY STATEMENT

Plaintiff's investigation and discovery of the facts relating to this case, and preparation for trial,  
are continuing and not complete. All of the responses contained herein are presently available to and  
specifically known to this Plaintiff and disclose only those contentions which presently occur to such  
Plaintiff. This Plaintiff will, during the course of this litigation, pursue extensive formal discovery, as

1 well as extensive investigation and informal discovery on her own. Therefore, without suggesting or  
2 implying any interest to respond less than fully to the Demand for Production, this Plaintiff must point  
3 out that her responses are of necessity of a somewhat preliminary nature and that the full factual basis  
4 concerning this matter is yet to be developed with complete precision. However, this Plaintiff assumes  
5 no obligation to voluntarily supplement or amend these responses to reflect any facts, contentions,  
6 witnesses, and evidence which may be discovered following the serving of theses response. The  
7 response contained herein are made in a good faith effort to supply as much factual information and as  
8 much specification of legal contentions as is presently known.

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

10 Admit that you cannot establish financial responsibility as required by California Civil Code  
11 Section 3333.4, enacted by the voters of the State of California through Initiative Measure Proposition  
12 213 and effective November 5, 1996, for the time of the accident which forms the basis of this lawsuit.  
13 330 North Brand Blvd., Suite 900 Glendale, CA 91203-2340 Electronic Address:  
14 LosAngelesLegal@allstate.com Telephone: (818) 548-6381 By: LOWELL G. HOUGHTON State Bar  
15 No. 206372 Our File No. 0609106323.1- Attorneys for Defendant(s): EMIL JAQUIAS, JOSE ZAGO  
16 and SUSANA ZAGO

17 **RESPONSE TO REQUEST FOR ADMISSION:**

18 Objection. This discovery request seeks attorney work product in violation of Code of Civil  
19 Procedure sections 2018.020 and 2018.030. Notwithstanding the foregoing objections and subject  
20 thereto, Responding Party responds as follows:

21 Admit.

22 Dated: COHEN LAW PARTNERS

23  
24 By: \_\_\_\_\_  
25 Darren A. Reid  
26 Attorneys for Plaintiff  
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