JOSHUA C. COHEN, ESQ. #257960

DARREN A. REID, ESQ. #321922

COHEN LAW PARTNERS

4929 Wilshire Boulevard, Suite 412

Los Angeles, California 90010-3818

Telephone: (323) 937-7105

Facsimile: (323) 937-0958

Email: cohenlaw@cohenlawpartners.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF NAME OF COUNTYX**

|  |  |
| --- | --- |
| PLAINTIFFX, an individual;  Plaintiff,  vs.  DEFENDANTX; Does 1 TO 10, Inclusive,  Defendants. | **Case No. CASENUMBERX**  **PLAINTIFF’S RESPONSES TO DOCUMENTX** |

PROPOUNDING PARTY: Defendant, DEFENDANTX

RESPONDING PARTY: Plaintiff, PLAINTIFFX

SET NUMBER: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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

**REQUEST FOR ADMISSION NO. 1:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

**REQUEST FOR ADMISSION NO. 2:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

**REQUEST FOR ADMISSION NO. 3:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

**REQUEST FOR ADMISSION NO. 4:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

**REQUEST FOR ADMISSION NO. 5:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

**REQUEST FOR ADMISSION NO. 6:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

**REQUEST FOR ADMISSION NO. 7:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

**REQUEST FOR ADMISSION NO. 8:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

**REQUEST FOR ADMISSION NO. 9:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

**REQUEST FOR ADMISSION NO. 10:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

**REQUEST FOR ADMISSION NO. 11:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

**REQUEST FOR ADMISSION NO. 12:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

**REQUEST FOR ADMISSION NO. 13:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

**REQUEST FOR ADMISSION NO. 14:**

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

**REQUEST FOR ADMISSION NO. 15:**

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

**REQUEST FOR ADMISSION NO. 16:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

**REQUEST FOR ADMISSION NO. 17:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

**REQUEST FOR ADMISSION NO. 18:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

**REQUEST FOR ADMISSION NO. 19:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

**REQUEST FOR ADMISSION NO. 20:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

**REQUEST FOR ADMISSION NO. 22:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

**REQUEST FOR ADMISSION NO. 26:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

**REQUEST FOR ADMISSION NO. 27:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

**REQUEST FOR ADMISSION NO. 28:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

**REQUEST FOR ADMISSION NO. 29:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

**REQUEST FOR ADMISSION NO. 30:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

**REQUEST FOR ADMISSION NO. 31:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

**REQUEST FOR ADMISSION NO. 32:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

**REQUEST FOR ADMISSION NO. 33:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

**REQUEST FOR ADMISSION NO. 34:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

**REQUEST FOR ADMISSION NO. 41:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

**REQUEST FOR ADMISSION NO. 46:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

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**RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

**REQUEST FOR ADMISSION NO. 50:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

**REQUEST FOR ADMISSION NO. 51:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

**REQUEST FOR ADMISSION NO. 52:**

**RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

Dated: DATE, 2019  **COHEN LAW PARTNERS**

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

Darren A. Reid

Attorneys for Plaintiff