

Attachment 1 to DISC-020

- 1.) Admit that you filed a lawsuit against Defendant.
- 2.) Admit that you did not verify each and every purchase made with the credit services you allege were provided in the complaint.
- 3.) Admit that you did not review the military status of Defendant prior to filing this lawsuit.
- 4.) Admit that you did not review the possible bankruptcy status of Defendant prior to filing this lawsuit.
- 5.) Admit that you did not verify the statute of limitations application prior to filing this lawsuit.
- 6.) Admit that the last payment date in the Complaint is inaccurate.
- 7.) Admit that the charge-off date in the Complaint is inaccurate.
- 8.) Admit that you failed to verify the debt prior to filing this lawsuit.
- 9.) Admit that by filing this lawsuit, you are in violation of the California Rosenthal Fair Debt Collection Practices Act.
- 10.) Admit that by filing this lawsuit, you are in violation of the Federal Fair Debt Collection Practices Act.
- 11.) Admit that you did not verify the interest rates alleged in the complaint prior to filing this lawsuit.
- 12.) Admit that the interest rate prayed for in the complaint is in excess of the legally permitted rate in the state of California.
- 13.) Admit that you never sent Defendant a legal demand letter over the debt prayed for in the complaint.
- 14.) Admit that you did not review any legal demand letter allegedly sent to Defendant prior to filing this lawsuit.

- 1 15.) Admit that you did not review the E-Oscar system for any
2 allegations of fraud prior to filing this lawsuit.
- 3 16.) Admit that you did not review a chain of title for the debt
4 prayed for in the complaint prior to filing this lawsuit.
- 5 17.) Admit that you do not possess a chain of title for the debt
6 prayed for in the complaint.
- 7 18.) Admit that the DEFENDANT does not owe the amount prayed for in
8 the complaint.
- 9 19.) Admit that you did not conduct a skip trace to verify the
10 Defendant's address prior to filing this lawsuit.
- 11 20.) Admit that you filed this action in an inaccurate jurisdiction.
- 12 21.) Admit that you failed to verify the accuracy of the debt with any
13 original creditor with a claim to the debt prayed for in the complaint.
- 14 22.) Admit that You are not entitled to interest in any action to
15 recover the debt prayed for in the complaint.
- 16 23.) Admit that You are not entitled to attorney fees in any action to
17 recover the debt prayed for in the complaint.
- 18 24.) Admit that you are not in possession of the written agreement
19 between the Defendant and the creditor services company from which the
20 debt prayed for in the complaint originated.
- 21 25.) Admit that you are not entitled to recover anything from this
22 action.
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