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{YOUR INFO HERE}

Superior Court of California
For the County of *{YOUR COURT}*

{JDB HERE},
Plaintiff,
vs.
{YOUR NAME HERE},
Defendant

) Case No.: *{YOUR CASE NUMBER}*
)
)
) **DEFENDANT'S RESPONSE TO**
) **REQUEST FOR ADMISSION SET NO.1**
)
)
)

Responding Party: **DEFENDANT**

{YOUR NAME HERE}

REQUEST FOR ADMISSION SET NO.1

Requesting party: **PLANTIFF**

{JDB NAME HERE}

{YOUR NAME HERE}, the defendant in the above cause, responds as follows to the first set of Requests for Admission of plaintiff, Midland Funding LLC:

NO. 1: DENIED to the extent that no application was attached hereto for evaluation.

NO. 2: DENIED to the extent that no admissible evidence establishing use of the unproven account was appended hereto for evaluation.

NO. 3: DENIED to the extent that no evidence establishing Chase bank's "predecessor" was appended hereto, nor was such a predecessor identified in the complaint.

NO. 4: DENIED to the extent that payments to the original creditor, the ACCOUNT, are immaterial to the extent that it has no bearing on the instant action, the purpose of which is to establish that Midland Funding now owns said account and is entitled to collect, a fact which is yet unproven.

NO. 5: DENIED.

- 1 NO. 6: Admitted in part to the extent that no liability for any such payment has been established,
2 therefore no payment is required. DENIED in part to the extent that Plaintiff has produced no
3 admissible evidence establishing ownership or liability.
- 4 NO. 7: OBJECTION No admissible evidence was attached hereto which would allow defendant to
5 make an informed response.
- 6 NO. 8: DENIED
- 7 NO. 9: ADMITTED in part to the extent that documents which have not been provably received
8 need no objection thereto.
- 9 NO. 10: OBJECTION Argumentative and lacking in foundation. Defendant will challenge
10 ownership at trial.
- 11 NO. 11: OBJECTION Argumentative and lacking in foundation. No proof of receipt of the alleged
12 document has been introduced. Additionally, defendant cannot and is not required to verify the
13 veracity of the plaintiff's proof.
- 14 NO. 12: DENIED Defendant owes Midland nothing.

14 Verification

15 I, ***{YOUR NAME HERE}***, am defendant in the above cause of action. I have read the first Set of
16 Requests for Admission propounded to me by plaintiff, Midland Funding LLC, and my Response
17 to the request. I am familiar with the contents of both. Based on my knowledge, the responses to
18 plaintiff's requests are true.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct.

21 ***{DATE}***

22
23
24 ***{YOUR NAME HERE}***

25 In Pro Per

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