

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
EASTERN DIVISION AT [REDACTED]

[REDACTED],

PLAINTIFF,

v.

[REDACTED]

DEFENDANT.

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CIVIL ACTION NO. [REDACTED]

JUDGE [REDACTED]

PLAINTIFF [REDACTED] REQUEST FOR ADMISSION TO  
DEFENDANT [REDACTED]

NOW COMES Plaintiff [REDACTED], by and through her attorney, pursuant to Rule 36 of Federal Rule of Civil Procedure, request that Defendant [REDACTED] make the following admission of fact within thirty (30) days of the date is service is made. The Request for Admissions shall be deemed continuing. Supplemental responses shall be provided immediately in the event that Defendant [REDACTED] obtains, either directly or indirectly, any information different from the previously given.

DEFINITIONS

- A. "Defendant" and "You" shall mean Defendant [REDACTED].
- B. "Plaintiff" shall mean Plaintiff [REDACTED].
- C. "Accident" means and refers to the incident described in Plaintiff's Complaint upon which this suit is founded.

Respectfully submitted,

/s/ [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Attorney for Plaintiff

DATED: November 3, [REDACTED]

**REQUEST FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Admit that significant injury can occur in a motor vehicle accident.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 2:** The Plaintiff, [REDACTED], was in the back seat of Defendant [REDACTED] vehicle when he (Defendant) rear-ended another car.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 3:** Admit that you were driving the [REDACTED] vehicle with [REDACTED] motor vehicle tags on the day of the accident.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 4:** Admit that you were texting and driving fifty-five (55) miles per hour and failed to observe a safety distance, and rear-ended the vehicle in front of you, causing injury to Plaintiff [REDACTED]

**ANSWER:**

**REQUEST FOR ADMISSION NO. 5:** If your answers to any of the foregoing Request for Admission No. 4 is anything by an unqualified admission, please state:

- a. Each and every reason why you deny the request for admissions;
- b. The identity of each and every witness you intend to call in support of your denial;

- c. State in detail the reasons and/or facts for each denial and summarize in detail the testimony you anticipate each witness will provide in support of the denial.
- d. Produce a copy of any document, photograph, or any other evidence you intend to rely upon in support of your denial.

**ANSWER:**

/s/ [REDACTED]  
[REDACTED] LAW OFFICE  
[REDACTED]  
Cincinnati, Ohio 45202  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Attorney for Plaintiff

**DATED:** November 3, [REDACTED]

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically and duly served to the following party by operation of the Court's electronic filing system this 3rd day of November [REDACTED]. Parties may access this filing through the Court's system.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Attorney for Defendant

/s/ [REDACTED]  
[REDACTED]