

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Acme Home & Garden, LLC,

Case Type: Contract

Court File No.: xx-CV-xx-xxx

Plaintiff,

v.

**PLAINTIFF ACME HOME & GARDEN,
LLC'S FIRST SET OF REQUESTS
FOR ADMISSIONS TO
PLAINTIFF JOHN DOE**

John Doe,

Defendant.

TO: DEFENDANT JOHN DOE, BY AND THROUGH HIS ATTORNEY, RONNIE RAGAN, 550
BROADVIEW STREET, MINNEAPOLIS, MINNESOTA 55402

PLEASE TAKE NOTICE that Plaintiff Acme Home & Garden, LLC requires of
Defendant John Doe answers under oath to the following Requests for Admissions within thirty
(30) days from the date of service hereof pursuant to Minnesota Rules of Civil Procedure 36.

INSTRUCTIONS & DEFINITIONS

1. In answering these Requests for Admissions, please furnish all information
available to You, however obtained, including hearsay information known by, or in the
possession of Your agents, including Your attorney.

2. If You cannot fully answer a Request for Admission in full, even after exercising
due diligence to secure the information, answer to the greatest extent possible. Specify Your
inability to answer the remainder, and state whatever information and knowledge You have

concerning the unanswered portion. Specify what You did to attempt to secure the unknown information.

3. These Requests for Admissions are deemed to be continuing so as to require supplemental answers if additional information is obtained between the time the answers are served and the time of trial.

4. Immediately prior to Your answer to each Request for Information, or any part thereof, restate the Request for Admissions or any part thereof.

5. Divulge all knowledge and/or information which is in the possession, custody or control of You, Your attorneys, employees, investigators, agents, or other representatives or persons acting on Your behalf.

6. If You object to any Request for Admission or part thereof on the grounds that it calls for the provision of privileged communications between attorney and client, state: (a) the date on which the communication occurred; (b) the parties to the communication; (c) the type of communication, e.g., telephone conversation, personal conversation, etc.; (d) the identity of all persons present when the communication took place, who overheard the communication, or who read the communication; and (e) the identity of all persons to whom the communication has been divulged.

7. If You object to any Request for Admission or part thereof on the grounds that it calls for information protected by the "work-product" doctrine, state all facts on which You rely to support the validity of such objection.

8. If any of the information requested in the following Requests for Admissions is stored in a computer or any other means of electronic data compilation or storage, provide hard, i.e., printed copies.

9. If an answer to any Request for Admission or part thereof is not provided to Plaintiff's counsel within 30 days after service of these requests, it shall be deemed to have been admitted.

10. **"You" and "Your"** shall refer to **John Doe**, as well as all persons acting on Your behalf, including, but not limited to, attorneys and their associates, investigators, employees, agents and other representatives.

11. **The "Property"** shall refer to the property located at **2200 Pleasantville Avenue, Pleasantville, Minnesota**, as well as any part, internal or external, thereof.

12. **"Person"** as used herein refers to any natural person and/or any association, joint venture, partnership, corporation or other legal or business entity.

13. **"His"** as used herein shall be considered to include either the masculine or the feminine gender.

14. **"Document"** shall mean any written, printed, typed, recorded or other graphic matter of any kind or nature, whether produced, reproduced or stored on papers cards, tapes, belts, film or computer storage devices or any other medium; and it shall also mean all tangible things including writings, drawings, graphs, charts, photographs, models, machinery, and instrumentalities within the scope of Rules 26 and 34 of the Rules of Civil Procedure, in the possession and/or control of You or Your agents, attorneys, and any other person acting or purporting to act on behalf of You or known by You to exist, including all originals, copies of originals, non-identical copies or originals, and all prior drafts thereof.

15. **"Identify" or "identity,"**

a. when used in the reference to an individual, means and requires You to state: (1) his full name; (2) his present business and home address; and (3) his present or last-known employer and his present or last-known position with such employer.

b. when used in reference to a firm, partnership, incorporated or unincorporated association or other legal or commercial entity, means and requires You to state: (1) its name; (2) the type of entity that it is, e.g. firm, partnership, C corporation, etc.; (3) its licensed or otherwise registered agent as required by law, if applicable; and (4) its place of incorporation or formation, as applicable.

c. when used in reference to a document, means and requires You to state: (1) the date of its preparation or compositions; (2) its author; (3) its intended recipient; (4) its title or designation; (5) a summary of its contents; and (6) its present location and the person who has possession, custody, or control of it.

d. when used in reference to a conversation, conference or meeting, or communication, means and requires You to state: (1) its date and time; (2) its location; (3) the identity of all participating, attending, or observing persons; (4) the identity of all documents that record, summarize, or otherwise reflect the contents of the conversation, conference or meeting, or communication; and (5) the method of communication, e.g. telephone, conference call, in-person, etc.

16. **"Expert"** shall mean any person whom You claim or may claim: (a) possesses a special skill or knowledge derived from his experience; and (b) is qualified to have an opinion or to state a conclusion concerning any matter at issue in this litigation or is capable of aiding a jury in determining the facts.

REQUESTS FOR ADMISSIONS

1. Admit that the attached Exhibit 1 is a true and correct copy of the contract between You and Plaintiff.
2. Admit that Exhibit 1 comprises the only written agreement between You and Plaintiff.
3. Admit that You paid Plaintiff only \$20,000 for Plaintiff's services.

LEGALLANDING LAW OFFICES

Date: July ___, 2010

By: _____

Attorney (#xxxxxxx)
LegalLanding Law Offices
1050 East Law Boulevard
Minneapolis, MN 55402
(612) xxx-xxxx

ATTORNEYS FOR PLAINTIFF