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8 Attorneys for Plaintiff,  
9 #####

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF SAN DIEGO**

12 #####,

13 Plaintiff,

14 vs.

15 #####,

16 Defendants.

Case No:

17 **PLAINTIFF #####'S REQUEST FOR**  
18 **ADMISSIONS, SET NO. ONE TO**  
19 **DEFENDANT #####**

Assigned To: Hon. #####  
Dept : ###

Complaint Filed on: #####

20  
21 **PROPOUNDING PARTY: PLAINTIFF, #####**

22 **RESPONDING PARTY: DEFENDANT, #####**

23 **SET NO.: ONE**

24 Plaintiff ##### hereby requests that ##### respond to his  
25 First Set of Requests for Admissions pursuant to *Code of Civil Procedure* section  
26 2030.010.

1  
2 **DEFINITIONS**

3 1. The terms "YOU" or "YOUR" as used herein shall mean #####.

4 **REQUEST FOR ADMISSIONS**

5 **REQUEST FOR ADMISSION NO. 1:**

6 Admit YOU are not relying upon advice of counsel as a defense in this matter.

7 **REQUEST FOR ADMISSION NO. 2:**

8 Admit YOU followed your standard claims handling practices in adjusting  
9 ##### claims for ##### from 2017 to the present.

10 **REQUEST FOR ADMISSION NO. 3:**

11 Admit YOUR claims decisions regarding ##### claims for health benefits  
12 from 2017 to the present were unreasonable.

13 **REQUEST FOR ADMISSION NO. 4:**

14 Admit YOU owe ##### insurance benefits reasonably related to his  
15 ##### from 2017 to the present.

16 DATED:

DANIELS LAW

17  
18  
19 By: \_\_\_\_\_  
20 William A. Daniels, Esq.  
21 Attorneys for Plaintiff  
22 #####