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Steven D. Grierson
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LUBA DACE
[redacted]
[redacted]
Self-Represented

DISTRICT COURT

CLARK COUNTY, NEVADA

LUBA DACE, Plaintiff, v. TD BANK/TARGET, Defendant.	Case No.: A-23-876885-C Dept. No.: 11 REQUEST FOR ADMISSIONS

COMES NOW Plaintiff, pursuant to NRCP Rule 36(a)(3), requests that the Defendant answer, under oath and in writing within thirty days of service, the following Request for Admissions. Requests for admission may require a party to admit the truth of any matters relating to "facts, the application of law to fact, or opinions about either." NRCP 36(a)(1)(A).

I. INSTRUCTIONS

If objection is made, the reasons shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter. An answering party may not give lack of info or knowledge as a reason for failure to admit or deny unless it's stated that reasonable inquiry and info known or readily obtainable is insufficient to enable admittance or denial. A party who considers that a matter of which an admission had been requested presents a genuine issue for trial, may not, on that ground alone, object to the request. The answers shall include knowledge of the parties to whom the request is directed, their attorneys, all agents, servants, representatives, investigators and others who may have obtained info on behalf of those parties or their attorneys. Each party to whom this request is directed, is required to supplement, in the time period allowed, his/her response with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters and the identity of each person expected to testify and the substance of his/her testimony. The party to whom this request is directed is required to amend, in the time allowed, a response if he/she obtains information the basis of which he/she knows that the response was incorrect when he/she knows that the response, through correct when made, is no longer true and the circumstances are such that a failure to amend a response is in substance a knowing concealment. Rule 37(c)(2) provides that

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if a party fails to admit the truth of a matter under Rule 36, and the requesting party later proves the matter to be true, the requesting party may move after trial to recover the reasonable expenses, including attorney's fees, incurred in making the proof. U.S. v. Operation Rescue Nat'l, 111 F. Supp. 2d 948, 967-68 (1999); 8A Charles Alan Writ, Aruthur R. Miller & Richard Marcus, Federal Practice and Procedure 2290 (3d ed. 2002).

II. REQUEST FOR ADMISSIONS

REQUEST NO. 1: Admit that you are a buyer of debts. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 2: Admit the alleged debt in question was purchased from the original creditor. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 3: Admit American Jurisprudence 2d 73 states that *"The right of subrogation does not exist for a stranger to the transaction."* ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 4: Admit that you received a letter named *Debt Validation Request* on 2 MAR 2023 ❒ Admit❒Deny

REQUEST NO. 5: Admit that you received a letter named *Notice of Fault and Opportunity to Cure* on 5 APR 2023. ❒ Admit ❒Deny

REQUEST NO. 6: Admit that you did not send a Certified or Registered Mail confirmation in regard to the alleged debt being in dispute. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 7: Admit that you did not verify the alleged debt with the original creditor, obtaining a sworn affidavit by an authorized representative with first-hand knowledge of the account. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 8: Admit that you did not validate with the original creditor, by obtaining the contract that gave rise to the alleged debt. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 9: Admit that, per Restatement 2nd § 69, agreement by tacit acquiescence constitutes a valid contract. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 10: Admit that you did not notify all Credit Reporting Agencies (CRA) that the alleged debt was in dispute. ❒ Admit ❒Deny (if denial, explain)

REQUEST NO. 11: Admit that you are liable for the invalidated debt and thus multiple violations of the FCRA, FDCPA, TCPA and/or FOTI. ❒ Admit ❒Deny (if denial, explain)

I AFFIRM that a copy of this MOTION and AFFIDAVIT was mailed / delivered to:
❒ Plaintiff or ❒ Plaintiff's attorney | X Defendant or ❒ Defendant's attorney.

Luba Dace
by: _____ 4 September 2023
LUBA DACE