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7  
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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF RIVERSIDE

13 IN RE THE MARRIAGE OF:

14 PETITIONER: JOHN DOE

15 and

16 RESPONDENT: JANE DOE

CASE NUMBER: IND 000000

REQUESTS FOR ADMISSION OF  
FACTS AND OF GENUINENESS OF  
DOCUMENTS, SET NO. 1, TO THE  
PETITIONER JOHN DOE

17 PROPOUNDING PARTY: Respondent, Jane Doe

18 RESPONDING PARTY: Petitioner, John Doe

19 REQUESTS FOR ADMISSION SET NO.: ONE

20 In accordance with the provisions of Section 2033.030 of the Code of Civil  
21 Procedure, Respondent, JANE DOE, propounds to the Petitioner, JOHN DOE,  
22 Requests for Admission, Set No. One, as follows:

23 REQUESTS FOR ADMISSION OF FACTS

24 RFA No. 1:

25 The property commonly known as \_\_\_\_\_, Rancho Mirage, was  
26 acquired during the marriage and prior to YOUR alleged date of separation

27 RFA No. 2:

28 The property commonly known as \_\_\_\_\_, Rancho Mirage, is the

1 community property of the parties.

2 **RFA No. 3:**

3 The property commonly known as \_\_\_\_\_, Rancho Mirage, is jointly  
4 titled.

5 **RFA No. 4:**

6 Respondent never executed any Quitclaim Deed to YOU at any time pertaining  
7 to the property commonly known as \_\_\_\_\_, Rancho Mirage.

8 **RFA No. 5:**

9 No Family Code section 2640 reimbursements are due you from the property  
10 commonly known as \_\_\_\_\_, Rancho Mirage.

11 **RFA No. 6**

12 No transmutation ever occurred between either party as to the property  
13 commonly known as \_\_\_\_\_, Rancho Mirage.

14 **RFA No. 7:**

15 The 60% interest you hold in ABC, LLC is the community property of the parties.

16 **RFA No. 8:**

17 No Family Code section 2640 reimbursements are due you from the 50%  
18 interest in ABC, LLC.

19 **RFA No. 9:**

20 The 100% interest you hold in [the family business], Inc., is the community  
21 property of the parties.

22 **RFA No. 10:**

23 No Family Code section 2640 reimbursements are due you from the 100%  
24 interest in [the corporate family business].

25 **RFA No. 11:**

26 The interest you hold in XYZ Development is the community property of the  
27 parties.

28 **RFA No. 12:**

1 No Family Code section 2640 reimbursements are due you from the interest in  
2 XYZ Development.

3 **RFA No. 13:**

4 The interest you hold in the promissory note from Robert Smith is the community  
5 property of the parties.

6 **RFA No. 14:**

7 No Family Code section 2640 reimbursements are due you from the interest in  
8 the promissory note from Robert Smith.

9 **RFA No. 15:**

10 You hold no depository interest in any banking institution located outside the  
11 continental United States.

12 **RFA No. 16:**

13 There were no unsecured debts with lending institutions with an outstanding  
14 balance on the date of separation claimed by you in the Petition.

15 **RFA No. 17:**

16 The date of physical separation alleged by you occurred as of June 1, 2013.

17 **REQUEST FOR ADMISSION OF GENUINENESS OF DOCUMENTS**

18 **RFA No. 18:**

19 The document attached hereto as **EX-1** is a true and correct copy of the original  
20 transfer deed executed by you.

21 **RFA No. 19:**

22 The writing attached hereto as **EX-2** is a true and correct copy of the original  
23 executed by you.

24 DATED:

THURMAN W. ARNOLD, III CFLS  
Attorney for Respondent,  
JANE DOE

25  
26  
27 **ASSUME QUESTIONS TOTALING MORE THAN 35 OVERALL SPECIFIC TO THE**  
28 **ISSUES/PROPERTY IN YOUR CASE**

**DECLARATION RE ADDITIONAL DISCOVERY**

1. I am the attorney of record for the Respondent to this action.

2. I am propounding to Petitioner the attached Set No.1 of Requests for Admission..

3. This set of requests will cause a total number of 38 Requests for Admission propounded to the party to whom they are directed to exceed the number of RFA's permitted by paragraph (1) of subdivision (c) of Section 2033.030.

4. I have previously propounded no RFA's to this party.

5. This set of requests contains a total of [more than 35] RFA's.

6. I am personally familiar with the issues in previous discovery conducted by all parties in this case.

7. I personally examined each of the questions of this set.

8. This number of questions is warranted under paragraph (2) of subdivision (c) of Section 2033.030 of the Code of Civil Procedure because they will expedite the investigation of this case, follow-up on previous responses, and is necessary to evaluate this substantial asset dissolution proceeding. Furthermore, the number of questions set forth in this set is warranted because only Petitioner has this information in his possession.

9. None of the questions in this set of production requests is being propounded for any improper purpose, such as to harass that party, or the attorney for the party, to whom it is directed, or to cause unnecessary delay or needless increase in the cost of litigation.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on \_\_\_\_\_ 2014 at Palm Springs, Riverside County, California.

\_\_\_\_\_  
THURMAN W. ARNOLD, III, CFLS  
Attorney for Respondent,  
JANE DOE