IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SNOHOMISH

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| In re the Marriage of:  JANE D. SMITH,  Petitioner(s),  and  JOHN D. SMITH,  Respondent(s). | No. 55-5-55555-5  RESPONDENT’S FIRST REQUESTS FOR ADMISSION PROPOUNDED UPON PETITIONER |

TO: Petitioner JANE D. SMITH, and her counsel, if any

Pursuant to CR 36 you are requested to admit or deny the truth of the statements of opinions, statements of fact, the application of law to fact and the genuineness of the documents set forth and/or identified in the following Requests within the time allowed by the rule (usually 30 days).

Detailed reasons must be stated for any objection. Answers must specifically deny the request set forth in detail, the reasons why you cannot truthfully admit or deny the request. If part of the request is true, you must specify which part is true and which part is denied. Lack of knowledge or information is **not** a reason for failure to admit or deny, absent specified and explained reasonable inquiry.

THESE REQUESTS ARE CONTINUING IN NATURE AND REQUIRE SUPPLEMENTAL ANSWERS UPON YOUR DISCOVERY OF FURTHER RESPONSIVE INFORMATION.

DATED this \_\_\_\_\_\_ day of November, 2020.

GENESIS LAW FIRM, PLLC

SAMUEL K. DARLING, WSBA No. 40157

Attorneys for Respondent

1. Admit or deny that your Boeing L&I claim was denied, including on appeal, in or around July or August of 2012.

ANSWER:

1. Admit or deny that L&I ordered and/or cleared you to return to work upon denial of your claim.

ANSWER:

1. Admit or deny that Boeing terminated your employment in 2012 for failure to return to work.

ANSWER:

1. Admit or deny that, after Boeing terminated your employment, you applied for federal disability benefits.

ANSWER:

1. Admit or deny that your application for federal disability benefits was denied.

ANSWER:

1. Admit or deny that you have no documentation from a doctor or independent medical examiner stating that your medical condition(s) currently prevent you from working fulltime.

ANSWER:

1. Admit or deny you told John you would make the divorce a “huge mess” unless he gave you money.

ANSWER:

1. Admit or deny that, in your declaration to the court, you wrote that John “tried to strangle [you] on 2 separate occasions and admitted this to the police”; yet you have no police records or police statements documenting his supposed admission.

ANSWER:

1. Admit or deny that there are no police records of any such incident.

ANSWER:

1. Admit or deny that, after the parties’ separation, you repeatedly contacted John’s girlfriend’s son and John’s parents and made negative comments about John.

ANSWER:

1. Admit or deny that, in a phone discussion with John’s attorney, you denied contacting John’s girlfriend’s son and John’s family members.

ANSWER:

1. Admit or deny that, after the parties’ separation, you repeatedly contacted John’s girlfriend, including phone calls and text messages.

ANSWER:

1. Admit or deny that, after the parties’ separation, you continued to contact John’s girlfriend even after she threatened to file harassment charges against you.

ANSWER:

1. Admit or deny that you have called and/or texted John hundreds of times since the parties’ separation.

ANSWER:

1. Admit or deny that you have no record of John calling or texting you once since shortly after the parties’ separation.

ANSWER:

1. Admit or deny that, after the parties’ separation, you redirected at least nine of John’s monthly VA benefit checks from John’s account to your own bank account.

ANSWER:

1. Admit or deny that, after the parties’ separation, you redirected one of John’s paychecks to your own bank account.

ANSWER:

1. Admit or deny that you have no disability that currently prevents you from working fulltime.

ANSWER:

1. Admit or deny that you have no need for spousal maintenance.

ANSWER:

1. Admit or deny that you lied about John’s supposed domestic abuse towards you.

ANSWER:

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**CR 26 CERTIFICATION**

The undersigned certifies pursuant to Civil Rule 26(g) that he or she has read each answer, response and objection to these discovery requests, and that to the best of his or her knowledge, information, and belief formed after a reasonable inquiry, each is (1) consistent with the Civil Rules and warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; (2) not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the costs of litigation; and (3) not unreasonable or unduly burdensome or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.

DATED at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, this \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 201\_\_.

Jane D. Smith (or Her Counsel, if Any)

Petitioner

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of Washington that I am the Petitioner herein and have read the foregoing answers to Respondent’s First Requests for Admission to me, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, this \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 201\_\_.

Jane D. Smith

Petitioner