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**SUPERIOR COURT OF CALIFORNIA
LOS ANGELES COUNTY SUPERIOR COURT
CENTRAL DISTRICT**

Dylan Yeiser-Fodness) Case No.: 22STCV21852
PLAINTIFF,)
VS.) DEFENDANT 5 Star K-9 Academy, Inc
Master Dog Training, et al.) REQUEST FOR ADMISSION TO
DEFENDANTS) PLAINTIFF DYLAN YEISER-FODNESS
SET ONE

PROPOUNDING PARTY: DEFENDANT 5 Star K-9 Academy, Inc
RESPONDING PARTY: PLAINTIFF DYLAN YEISER-FODNESS
SET NUMBER: SET ONE

TO PLAINTIFF DYLAN YEISER-FODNESS AND HIS ATTORNEY OF RECORD:

DEFENDANT 5 Star K-9 Academy, Inc, hereby requests that PLAINTIFF DYLAN YEISER-FODNESS pursuant to California Code of Civil Procedure, section 2033.010, et seq, admits the truth of the following matters of facts, under oath, within 30 days.

INSTRUCTIONS

Requests for admission are written requests by a party to an action requiring that any other party to the action either admit or deny, under oath, the truth of certain facts or the genuineness of certain documents. For information on timing, the number of admissions a party may request from any other party, service of requests and responses, restrictions on the style, format, and scope of requests for admission and responses to requests, and other details, see Code of Civil Procedure sections 94-95, 1013, and 2033.010-2033.420 and the case law relating to those sections.

An answering party should consider carefully whether to admit or deny the truth of facts or the genuineness of documents. With limited exceptions, an answering party will not be

1 allowed to change an answer to a request for admission. There may be penalties if an answering
2 party fails to admit the truth of any fact or the genuineness of any document when requested to
3 do so and the requesting party later proves that the fact is true or that the document is genuine.
4 These penalties may include, among other things, payment of the requesting party's attorney's
5 fees incurred in making that proof.

6 Unless there is an agreement or a court order providing otherwise, the answering party
7 must respond in writing to requests for admission within 30 days after they are served, or within
8 5 days after service in an unlawful detainer action. There may be significant penalties if an
9 answering party fails to provide a timely written response to each request for admission. These
10 penalties may include, among other things, an order that the facts in issue are deemed true or that
11 the documents in issue are deemed genuine for purposes of the case.

12 Answers to Requests for Admission must be given under oath. The answering party
13 should use the following language at the end of the responses:

14 I declare under penalty of perjury under the Saws of the State of California that the foregoing
15 answers are true and correct.

16 (Date) _____ (Signature) _____

17 These instructions are only a summary and are not intended to provide complete
18 information about requests for admission.

19 This Requests for Admission form does not change existing law relating Id requests for
20 admissions, nor does it affect an answering party's right to assert any privilege or to make any
21 objection.

22 DEFINITIONS

23 1. "DOCUMENT" or "DOCUMENTS" are used in the broad sense and include, but are
24 not limited to, anything coming within the definition of "writings" and "recordings" set forth in
25 California Evidence Code. Without limiting the foregoing, the terms "DOCUMENT" and
26 "DOCUMENTS" include, but are not limited to the following items in YOUR actual or
27 constructive possession, custody or control, whether such items are typed, printed, recorded,
28 stored in a computer, reproduced by any mechanical process, copied or written by hand:
contracts, communications, correspondence, telegrams, memoranda, statements, records,
reports, books, summaries and/or records of telephone conversations, summaries and/or records
of personal conversations, lists, manuals, databases, quotes, bids, rating methodology, diaries,
forecasts, orders, bills, invoices, checks, studies, graphs, charts, accounts, work papers, indexes,
data sheets, data processing cards, analytical records, minutes and/or records of meetings and
conferences, reports and/or summaries of interviews, reports and/or opinions of consultants,
attorneys, accountants and/or financial advisors, records, reports and/or summaries of
negotiations, brochures, lists, periodicals, pamphlets, circulars, trade letters, newspaper
clippings, press releases, notes, projections, drafts, working papers, copies, marginal notations,
photographs, drawings, tape recordings, financial statements, summaries, reports, records and
the like and all other written, printed, recorded or graphic matter, photographic matter or sound
productions, however produced or reproduced.

2. "YOU" or "YOUR" or "DEFENDANT" refers individually and collectively to
PLAINTIFF DYLAN YEISER-FODNESS , your agents, representatives, attorneys, employees,
partners, companies, corporations, partnerships, predecessors or successors in interest, or any
other person or entity under your control, direction or supervision.

1 3. "PLAINTIFF" refers to PLAINTIFF DYLAN YEISER-FODNESS , an individual.

2 4. "IDENTIFY" a person means to state his or her full name, address, and telephone
3 number; his or her occupation; the name, address, and telephone number of his or her employer,
4 if known; and any family, social, recreational, professional, professional, or employment
5 relationship YOU have with the person.

6 5. The term "RELATING TO" as used herein means in any way or manner, whether
7 directly or indirectly, relating to, referring to, reflecting, mentioning, describing, constituting,
8 concerning or incorporating the subject matter described.

9 6. The term "COMPLAINT" means the PLAINTIFF DYLAN YEISER-FODNESS
10 complaint for Case No.: 22STCV21852

11 7. The term "DOG" refers to the animal that was subject to training.

12 8. "VIDEO" refers to an information gathered by a camera, including but not limited to
13 surveillance video.

14 9. "RELEVANT TIME PERIOD" is from October 2, 2020 to April 24, 2022. Unless
15 otherwise stated, this is the relevant time period for all special interrogatories.

16 10. "WRITING" refers to a writing as defined by Evidence Code section 250 as:
17 "Writing" means handwriting, typewriting, printing, photostating, photographing, photocopying,
18 transmitting by electronic mail or facsimile, and every other means of recording upon any
19 tangible thing, any form of communication or representation, including letters, words, pictures,
20 sounds, or symbols, or {combinations thereof, and any record thereby created, regardless of the
21 manner in which the record ! has been stored.

22 11. "SECURITY CAMERAS" means the equipment that has been installed at the
23 property by the tenants of the underlying lease, without landlord permission.

24 12. "DATA" or "DIGITAL CONTENT" or "TANGIBLE RECORDS" mean any form of
25 content and/or recording, whether it is done in videotaping on the tape, or if it is done by
26 recording video on the hard drive, flash drive or any other data storage that might be used to
27 record and keep video data from recording made on these security cameras.

28 13." INCIDENT "refers to an alleged events of employment as pleaded in your complaint
during the relevant period of time from October 2, 2020 to April 24, 2022 .

**YOU ARE HEREBY REQUESTED TO ADMIT WITHIN THIRTY DAYS AFTER
SERVICE OF THIS REQUEST FOR ADMISSIONS THAT:**

**(I) EACH OF THE FOLLOWING FACTS IS TRUE (NUMBER EACH FACT
CONSECUTIVELY):**

REQUEST FOR ADMISSION No 1:

Admit that You were never hired in any capacity during relevant period of time by the
defendant 5 Star K-9 Academy, Inc

REQUEST FOR ADMISSION No 2:

Admit that You were applying to 5 STAR K-9 ACADEMY for training as a dog
trainer.

1 REQUEST FOR ADMISSION No 3:

2 Admit that You were applying to 5 STAR K-9 ACADEMY for a student loan for the
3 courses of dog trainers

4 REQUEST FOR ADMISSION No 4:

5 Admit that You do were receiving monthly student stipend while receiving your
6 training at 5 STAR K-9 ACADEMY

7 REQUEST FOR ADMISSION No 5:

8 Admit that you are abusing drugs and various controlled substances most of the time

9 REQUEST FOR ADMISSION No 6:

10 Admit that You did were appearing at the premises of the defendant 5 Star K-9
11 Academy, Inc while under the influence of controlled substances and drugs

12 REQUEST FOR ADMISSION No 7:

13 Admit that You were sexually harassing you fellow trainees at the premises of the
14 defendant 5 Star K-9 Academy, Inc

15 REQUEST FOR ADMISSION No 8:

16 Admit that you have financial problems and debts related to your use of controlled
17 substances and drugs

18 REQUEST FOR ADMISSION No 9:

19 Admit that you have financial problems and debts related to your use of controlled
20 substances and drugs

21 REQUEST FOR ADMISSION No 10:

22 Admit that you have financial problems and debts related to your use of controlled
23 substances and drugs

24 REQUEST FOR ADMISSION No 11:

25 Admit that you did not pay for your training to the defendant 5 Star K-9 Academy,
26 Inc

27 REQUEST FOR ADMISSION No 12:

28 Admit that you owe to defendant 5 Star K-9 Academy, Inc \$3,500 for the training
you received.

REQUEST FOR ADMISSION No 13:

Admit that on or about April 2022 you were extorting \$10,000 from Maksim Basiro
by threatening to cause physical harm to Maksim Basiro and his family.

REQUEST FOR ADMISSION No 14:

Admit that you have financial problems and debts related to your use of controlled

substances and drugs

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Respectfully submitted,
Dated: 3/10/2023

By: _____
NATALIA FOLEY, ESQ
ATTORNEY FOR DEFENDANT 5 STAR K-9 ACADEMY, INC