

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE NORTHERN DISTRICT OF GEORGIA**

3 AF HOLDINGS, LLC,)

4 Plaintiff,)

5 -v-

6 RAJESH PATEL,)

7 Defendant.)

Civil Action Number
2:12-cv-00262-WCO

**PLAINTIFF’S RESPONSE TO
DEFENDANT’S REVISED FIRST
REQUEST FOR ADMISSIONS**

8 TO DEFENDANT’S COUNSEL

9 Plaintiff, through and by its counsel, Jacques Nazaire, Esq., in response to
10 Defendant’s requests for admissions, which is written as “Defendant’s Revised First
11 Request For Admissions” hereby sets forth the following.
12

- 13 1. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 14 2. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 15 3. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 16 4. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 17 5. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 18 6. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 19 7. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 20 8. Objected to as privileged communication.
- 21 9. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 22 10. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 23 11. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 24 12. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 25 13. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
- 26 14. Plaintiff cannot admit or deny as the document was not drafted by plaintiff.
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- 15. Objected to under FRE 1002. Additionally, the document may be privileged communication.
- 16. Objected to as possibly privileged communication.
- 17. Objected to as possibly privileged communication.
- 18. Objected to as being possibly protected by attorney client privilege.
- 19. Objected to as being possibly protected by attorney client privilege.
- 20. Objected to as possibly protected by attorney client privilege.
- 21. Objected to as possibly protected by attorney client privilege.
- 22. Objected to as possibly protected by attorney client privilege.
- 23. Objected to as possibly protected by attorney client privilege.
- 24. Objected to possibly protected by attorney client privilege.
- 25. Objected to as possibly protected by attorney client privilege.
- 26. Objected to as possibly protected by attorney client privilege.
- 27. Objected to as possibly protected by attorney client privilege.
- 28. Objected, pursuant to FRE 1002.
- 29. Objected to as possibly protected by attorney client privilege.
- 30. Objected, per FRE 1002.
- 31. Objected to as possibly protected by attorney client privilege.
- 32. Objected to as possibly protected by attorney client privilege.
- 33. Objected to as possibly protected by attorney client privilege.
- 34. Objected to as possibly protected by attorney client privilege.
- 35. Objected to possibly protected by attorney client privilege.
- 36. Objected to as possibly protected by attorney client privilege.
- 37. Objected, per FRE 1002.

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- 38. Objected to as covered by attorney-client privilege.
- 39. Objected to as covered by attorney-client privilege.
- 40. Objected to as covered by attorney-client privilege
- 41. Objected to as covered by attorney-client privilege
- 42. Objected to as covered by attorney-client privilege.
- 45. Objected to as covered by attorney-client privilege.
- 46. Objected to as covered by attorney-client privilege.
- 47. Objected to as covered by attorney-client privilege.
- 48. Objected to as covered by attorney-client privilege.
- 49. Objected to as covered by attorney-client privilege.
- 50. Objected to under FRE 1002.
- 51. Objected to under FRE 1002.
- 52. Objected to under FRE 1002.
- 53. Objected to under FRE 1002.
- 54. Objected to under FRE 1002.
- 55. Objected to under FRE 1002.
- 56. Objected to under FRE 1002.
- 57. Objected to under FRE 1002.
- 58. Objected to under FRE 1002.
- 59. Objected to under FRE 1002.
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- 61. Objected to under FRE 1002.
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- 63. Objected to under FRE 1002.

- 1 64. Objected to under FRE 1002.
- 2 65. Objected to under FRE 1002.
- 3 66. Objected to under FRE 1002.
- 4 67. Objected to under FRE 1002.
- 5 68. Objected to under FRE 1002.
- 6 69. Objected to under FRE 1002.
- 7 70. Objected to under FRE 1002.
- 8 71. Objected to under FRE 1002.
- 9 72. Objected to under FRE 1002.
- 10 73. Objected to under FRE 1002.
- 11 74. Objected to under FRE 1002.
- 12 75. Objected to under FRE 1002.
- 13 76. Objected to under FRE 1002.
- 14 77. Objected to under FRE 1002.
- 15 78. Objected to under FRE 1002.
- 16 79. Objected to under FRE 1002.
- 17 80. Objected to under FRE 1002.
- 18 81. Objected to under FRE 1002.
- 19 82. Objected to under FRE 1002.
- 20 83. Objected to under FRE 1002.
- 21 84. Objected to under FRE 1002.
- 22 85. Objected to under FRE 1002.
- 23 86. Objected to under FRE 1002.
- 24 87. Objected to under FRE 1002.
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- 88. Objected to under FRE 1002.
- 89. Objected to under FRE 1002.
- 90. Objected to under FRE 1002.
- 91. Objected to under FRE 1002.
- 92. Objected to under FRE 1002.
- 93. Objected to under FRE 1002.
- 94. Objected to under FRE 1002.
- 95. Plaintiff cannot admit or deny since to the extent legible, these documents were not created by plaintiff.
- 96. Plaintiff cannot admit or deny as the exhibits are barely legible. .
- 97. Plaintiff cannot admit or deny as the exhibits are barely legible.
- 98. Plaintiff cannot admit or deny as the exhibits are barely legible.
- 99. Plaintiff cannot admit or deny as the exhibits are barely legible.
- 100. Plaintiff cannot admit or deny as the exhibits are barely legible.

Clarification: Black’s Law Dictionary Defines “Authentic” as: Genuine; true; having the character and authority of an original; duly vested with all necessary formalities **and** legally attested; competent, credible, and reliable as evidence.

Respectfully Submitted,

AF HOLDINGS

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