

1 intentional infliction of emotional distress, fraud and negligence (hereinafter "CHANDLER
2 LAWSUIT").

3 **REQUEST FOR ADMISSION NO. 79:**

4 Admit that DECEDENT was criminally investigated in connection with the allegations
5 made in the CHANDLER LAWSUIT (hereinafter "CHANDLER INVESTIGATION").

6 **REQUEST FOR ADMISSION NO. 80:**

7 Admit that DECEDENT selected, hired and paid for counsel to represent Wade Robson in
8 relation to Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

9 **REQUEST FOR ADMISSION NO. 81:**

10 Admit that Responding Party paid for counsel to represent Wade Robson in relation to
11 Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

12 **REQUEST FOR ADMISSION NO. 82:**

13 Admit that MJJ Ventures, Inc. paid for counsel to represent Wade Robson in relation to
14 Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

15 **REQUEST FOR ADMISSION NO. 83:**

16 Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in
17 the CHANDLER INVESTIGATION.

18 **REQUEST FOR ADMISSION NO. 84:**

19 Admit that DECEDENT told Wade Robson to testify in the CHANDLER
20 INVESTIGATION that no sexual activities had occurred between them.

21 **REQUEST FOR ADMISSION NO. 85:**

22 Admit that DECEDENT told Wade Robson that if Wade Robson testified in the
23 CHANDLER INVESTIGATION that sexual activities had occurred between them, they would
24 both go to jail.

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07/28/2014

1 **REQUEST FOR ADMISSION NO. 86:**

2 Admit that DECEDENT told Wade Robson that if Wade Robson testified in the
3 CHANDLER INVESTIGATION that sexual activities had occurred between them, both their
4 careers would be over.

5 **REQUEST FOR ADMISSION NO. 87:**

6 Admit that DECEDENT settled the CHANDLER LAWSUIT for a sum in excess of \$15
7 million.

8 **REQUEST FOR ADMISSION NO. 88:**

9 Admit that DECEDENT agreed to deliver "confessions of judgment . . . in the total amount
10 of \$15,331,250, to be held in trust by the Minor's attorneys of record with no copies to be made or
11 provided to any other person" in the Confidential Agreement and Mutual General Release that
12 settled the CHANDLER LAWSUIT.

13 **REQUEST FOR ADMISSION NO. 89:**

14 Admit that DECEDENT was tried in 2005 in Santa Barbara County, California on criminal
15 charges including child sexual abuse (hereinafter "2005 TRIAL").

16 **REQUEST FOR ADMISSION NO. 90:**

17 Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in
18 the 2005 TRIAL.

19 **REQUEST FOR ADMISSION NO. 91:**

20 Admit that DECEDENT told Wade Robson to testify in the 2005 TRIAL that no sexual
21 activities had occurred between them.

22 **REQUEST FOR ADMISSION NO. 92:**

23 Admit that DECEDENT told Wade Robson that if Wade Robson testified in the 2005
24 TRIAL that sexual activities had occurred between them, they would both go to jail.

25 **REQUEST FOR ADMISSION NO. 93:**

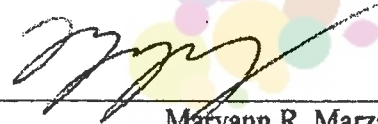
26 Admit that DECEDENT told Wade Robson that if Wade Robson testified in the 2005
27 TRIAL that sexual activities had occurred between them, both their careers would be over.

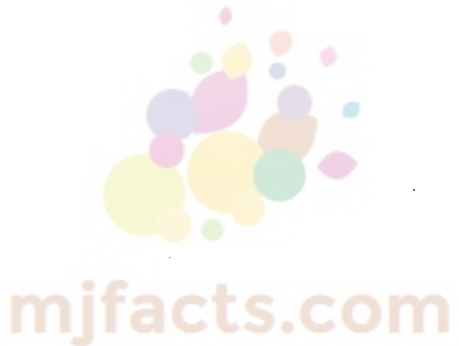
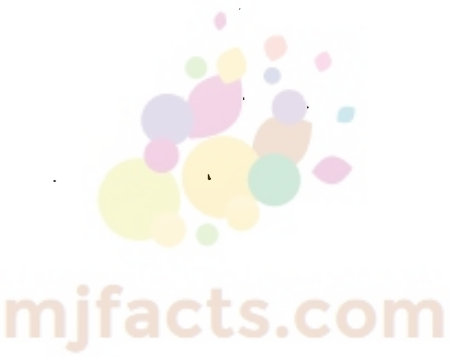
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DATED: May 21, 2014

GRADSTEIN & MARZANO, P.C.
HENRY GRADSTEIN
MARYANN R. MARZANO
MATTHEW A. SLATER

By: 
Maryann R. Marzano
Attorneys for Plaintiff WADE ROBSON



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DECLARATION FOR ADDITIONAL DISCOVERY.

I, Maryann R. Marzano, declare:

1. I am partner at Gradstein & Marzano, P.C., counsel of record for Plaintiff Wade Robson ("Plaintiff"). The facts set forth below are based upon my personal knowledge and, if called upon to testify as to the facts stated herein, I could and would competently so testify.

2. I am propounding to Respondent MJJ Productions, Inc. ("Respondent") the attached Requests for Admission, Set One.

3. This set of requests will cause the total number of specially prepared requests propounded to the party to whom they are directed to exceed the number of specially prepared requests permitted by Section 2033.030 of the Code of Civil Procedure.

4. I have not previously propounded any requests to this party. I am simultaneously propounding official form interrogatories.

5. This set of Requests for Admission contains a total of ninety-three (93) specially prepared requests.

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

7. I have personally examined each of the questions in this set of requests.

8. This number of questions is warranted under Section 2033.040 of the Code of Civil Procedure because of the complexity of the existing and potential issues, the quantity of the existing and potential issues, the financial burden on Plaintiff of conducting discovery without the use of these requests, and the expedience of using this method of discovery. The questions contained in this set of requests are necessary to obtain information regarding the facts on which Plaintiff bases its claims, as well as facts relevant to Respondent's affirmative defenses.

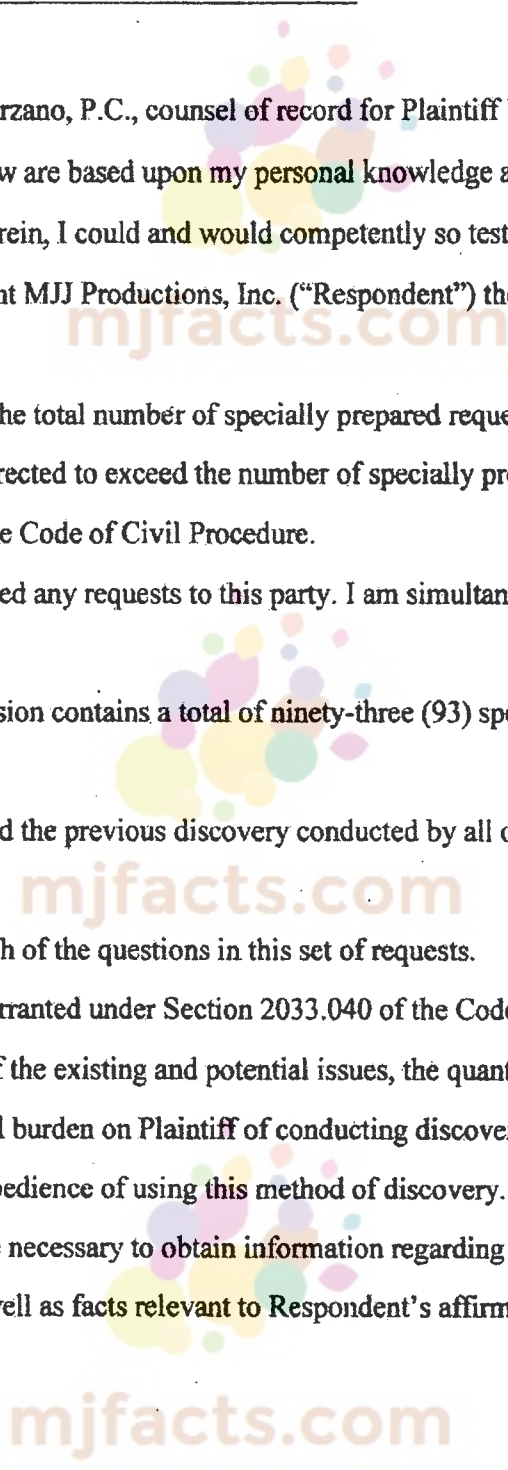
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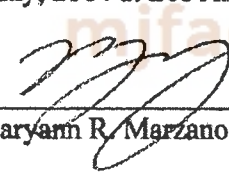


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9. None of the questions in this set of requests is being propounded for any improper purpose, such as to harass the party, or the attorney for the party, to whom it is directed, or to cause unnecessary delay or needless increase in the cost of litigation.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct

Executed on this twenty-first day of May, 2014 at Los Angeles, California.....



Maryann R. Marzano

mjfacts.com

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07 / 28 / 2014

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 6310 San Vicente Boulevard, Suite 360, Los Angeles, California 90048.

On May 22, 2014, I served the foregoing document, described as **PLAINTIFF WADE ROBSON'S FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT MJJ PRODUCTIONS, INC.** on each interested party in this action, as follows:

Howard Weitzman, Esq.
Jonathan Steinsapir, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

Jeryll S. Cohen, Esq.
Hoffman, Sabban & Watenmaker, P.C.
10880 Wilshire Boulevard, Suite 2200
Los Angeles, California, 90024

Service was accomplished as follows.

(BY U.S. MAIL)

I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service. The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Beverly Hills, California, in the ordinary course of such business.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 22, 2014, at Los Angeles, California.


Sidney Summers

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