

























GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

07/28/2014

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

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

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

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

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

8 Admit that MJJ Productions, Inc. paid for counsel to represent Wade Robson in relation to  
9 Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

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

11 Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in  
12 the CHANDLER INVESTIGATION.

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

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

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

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

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

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

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

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

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

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

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

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

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

10 Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in  
11 the 2005 TRIAL.

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

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

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

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

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


19 Admit that DECEDENT told Wade Robson that if Wade Robson testified in the 2005  
20 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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07/28/2014



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

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

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

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8 Maryahn R. Marzano

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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 VENTURES, 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

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 610  
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TELEPHONE: 323-778-3100

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