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**REQUESTS FOR PRODUCTION**

1. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, attorney-client privilege, confidential and proprietary. For its further objection, upon information and belief, many of the requested items are already in the possession, custody and/or control of the Defendant or are equally available to the Defendant. Additionally, Plaintiff is a debt purchaser and must obtain relevant, responsive documents from the original creditor. Such request has been made and Plaintiff will supplement upon receipt. Without waiving these objections, please see the following documents, attached hereto:
  - a. Affidavit of Amy Nickens, 1 page;
  - b. Bill of Sale, 1 page;
  - c. Itemized Billing Statements, 15 pages.
2. See response to Request for Production No. 1.
3. See response to Request for Production No. 1.
4. See response to Request for Production No. 1.
5. See response to Request for Production No. 1.
6. See response to Request for Production No. 1.
7. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, attorney-client privilege, confidential and proprietary.
8. See response to Request for Production No. 1.
9. See response to Request for Production No. 1.
10. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, attorney-client privilege, confidential and proprietary.

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- 11. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, calls for a legal conclusion. Without waiving these objections, see A.R.S. § 29-809(E)(8) and/or A.R.S. § 10-1501(B)(8).
- 12. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, calls for a legal conclusion. Without waiving these objections, see A.R.S. § 29-809(E)(8) and/or A.R.S. § 10-1501(B)(8).
- 13. See response to Request for Production No. 1.
- 14. See response to Request for Production No. 1.
- 15. See response to Request for Production No. 1.
- 16. See response to Request for Production No. 1.
- 17. See response to Request for Production No. 1.
- 18. See response to Request for Production No. 1.
- 19. See response to Request for Production No. 1.
- 20. See response to Request for Production No. 1.
- 21. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, attorney-client privilege, confidential and proprietary.

**REQUESTS FOR ADMISSION**

- 1. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, vague, ambiguous, the term “purchase agreement” is never defined.
- 2. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, vague, ambiguous, the term “you” is never defined.
- 3. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence. For its further objection, pursuant to the Fair Credit Billing Act and

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Regulation B at 12 CFR 202.12(b)(1) credit card applications are retained for up to twenty-five (25) months.

- 4. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence.
- 5. Deny.
- 6. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, calls for a legal conclusion.
- 7. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence.
- 8. Deny.
- 9. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, calls for a legal conclusion.
- 10. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, calls for a legal conclusion.
- 11. Deny.
- 12. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence.
- 13. Admit.
- 14. Deny.
- 15. Admit.
- 16. Objection- irrelevant, not reasonably calculated to lead to the discovery of admissible evidence.

