

SAN MATEO COUNTY

DEC - 4 2025

Dawn Calvert
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Clerk of the Superior Court
By *[Signature]*
DEPUTY CLERK

In Pro Per

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO - SOUTHERN BRANCH

DAWN CALVERT,

: Case No.: 23-CIV-05077

Plaintiff,

: PLAINTIFF'S RESPONSE TO REQUEST

: FOR ADMISSIONS

VS.

NEWELL'S COCKTAIL LOUNGE, et al., :

Defendants.

Plaintiff responds to the Defendant's request for admissions as follows:

REQUEST FOR ADMISSION NO. 1: Admit the night of YOUR injury YOU told Kaiser

Permanente employees that YOU fell out of a cart pushed by YOUR friend.

RESPONSE TO REQUEST FOR ADMISSION NO. 1: DENIED.

REQUEST FOR ADMISSION NO. 2: Admit the night of YOUR injury YOU told Kaiser

Permanente employees that YOU fell out of a wagon pushed by YOUR friend.

RESPONSE TO REQUEST FOR ADMISSION NO. 2: DENIED.

REQUEST FOR ADMISSION NO. 3: Admit the night of YOUR injury YOU told Kaiser Permanente employees that YOU fell off of a barstool while inside the LOCATION.

RESPONSE TO REQUEST FOR ADMISSION NO. 3: DENIED.

REQUEST FOR ADMISSION NO. 4: Admit the night of YOUR injury YOU told Kaiser Permanente employees that as of the night of YOUR injury YOU were homeless.

RESPONSE TO REQUEST FOR ADMISSION NO. 4: OBJECTION. This request seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence regarding the Defendant's negligence, breach of duty, or premises liability. DENIED.

REQUEST FOR ADMISSION NO. 5: Admit YOUR blood alcohol level was \$.18\$ at 3:50 a.m. the night of YOUR injury.

RESPONSE TO REQUEST FOR ADMISSION NO. 5: ADMITTED.

REQUEST FOR ADMISSION NO. 6: Admit YOU have enrolled in drug rehabilitation programs in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 6: OBJECTION. This request seeks information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 7: Admit YOU have enrolled in alcohol rehabilitation programs in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 7: OBJECTION. This request seeks

information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 8: Admit YOU have been homeless in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 8: OBJECTION. This request seeks information that is irrelevant, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence regarding the cause of action. DENIED.

REQUEST FOR ADMISSION NO. 9: Admit YOU have abused heroin in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 9: OBJECTION. This request is unduly harassing, highly prejudicial, and not reasonably calculated to lead to the discovery of admissible evidence. DENIED.

REQUEST FOR ADMISSION NO. 10: Admit YOU have abused methamphetamine in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 10: OBJECTION. This request is unduly harassing, highly prejudicial, and not reasonably calculated to lead to the discovery of admissible evidence. DENIED.

REQUEST FOR ADMISSION NO. 11: Admit YOU have presented no evidence proving there was a hazardous condition inside the LOCATION the night of YOUR alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 11: OBJECTION. This request is compound and premature, as discovery is ongoing. It improperly asks Plaintiff to admit the legal conclusion that her factual evidence does not constitute "proof." DENIED.

REQUEST FOR ADMISSION NO. 12: Admit YOU are unaware of evidence proving there was a hazardous condition inside the LOCATION the night of YOUR alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 12: DENIED.

REQUEST FOR ADMISSION NO. 13: Admit there is no evidence proving there was a hazardous location inside the LOCATION the night of YOUR alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 13: OBJECTION. This request is premature as discovery is ongoing and the investigation into all available evidence is continuing. It also improperly asks for an admission regarding the absence of evidence outside of the Plaintiff's direct control or knowledge. DENIED.

REQUEST FOR ADMISSION NO. 14: Admit YOU are unaware of evidence proving DEFENDANT was on notice for any type of hazardous condition inside the LOCATION the night of YOUR alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 14: DENIED.

REQUEST FOR ADMISSION NO. 15: Admit YOU have presented no evidence proving DEFENDANT was on notice for any type of hazardous condition inside the LOCATION the night of YOUR alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 15: OBJECTION. This request is premature, as discovery is ongoing. It improperly asks the Plaintiff to admit a legal conclusion regarding the sufficiency of her evidence. DENIED.

REQUEST FOR ADMISSION NO. 16: Admit there is no evidence proving DEFENDANT was on notice for any type of hazardous condition inside the LOCATION the night of YOUR

alleged fall.

RESPONSE TO REQUEST FOR ADMISSION NO. 16: OBJECTION. This request is premature as discovery is ongoing and the investigation into all available evidence is continuing. It also improperly asks for an admission regarding the absence of evidence outside of the Plaintiff's direct control or knowledge. **DENIED.**

REQUEST FOR ADMISSION NO. 17: Admit the night of YOUR injury YOU told conflicting accounts of what happened to Kaiser Permanente employees.

RESPONSE TO REQUEST FOR ADMISSION NO. 17: OBJECTION. This request is vague and ambiguous, and improperly asks for an admission regarding the legal conclusion that statements were "conflicting." **DENIED.**

REQUEST FOR ADMISSION NO. 18: Admit YOUR Complaints account of the evening YOU were INJURED conflicts with the accounts YOU told Kaiser Permanente employees the night of YOUR INJURY.

RESPONSE TO REQUEST FOR ADMISSION NO. 18: OBJECTION. This request is vague and ambiguous, and improperly asks for an admission regarding the legal conclusion that statements "conflict." **DENIED.**

REQUEST FOR ADMISSION NO. 19: Admit YOU are currently enrolled in a drug rehabilitation program.

RESPONSE TO REQUEST FOR ADMISSION NO. 19: OBJECTION. This request seeks information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries

sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 20: Admit YOU are currently enrolled in an alcohol rehabilitation program.

RESPONSE TO REQUEST FOR ADMISSION NO. 20: OBJECTION. This request seeks information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 21: Admit YOU are currently unhoused.

RESPONSE TO REQUEST FOR ADMISSION NO. 21: OBJECTION. This request seeks information protected by the right to privacy and is irrelevant to the issues of premises liability, the Defendant's negligence, or the nature and extent of the injuries sustained in the slip and fall. DENIED.

REQUEST FOR ADMISSION NO. 22: Admit YOU have been diagnosed with a mental health condition in the past 10 years.

RESPONSE TO REQUEST FOR ADMISSION NO. 22: OBJECTION. This request seeks information protected by the right to privacy, the psychotherapist-patient privilege, and the right to mental health confidentiality, and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 23: Admit at the time of YOUR injury YOU were enrolled in drug rehabilitation treatment.

RESPONSE TO REQUEST FOR ADMISSION NO. 23: OBJECTION. This request seeks information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 24: Admit at the time of YOUR INJURY YOU were addicted to heroin.

RESPONSE TO REQUEST FOR ADMISSION NO. 24: OBJECTION. This request is unduly harassing, asks for highly prejudicial information, and is not reasonably calculated to lead to the discovery of admissible evidence regarding the cause of action. DENIED.

REQUEST FOR ADMISSION NO. 25: Admit at the time of YOUR INJURY YOU were addicted to methamphetamine.

RESPONSE TO REQUEST FOR ADMISSION NO. 25: OBJECTION. This request is unduly harassing, asks for highly prejudicial information, and is not reasonably calculated to lead to the discovery of admissible evidence regarding the cause of action. DENIED.

REQUEST FOR ADMISSION NO. 26: Admit at the time of YOUR INJURY YOU were an alcoholic.

RESPONSE TO REQUEST FOR ADMISSION NO. 26: OBJECTION. This request seeks information protected by the right to privacy, is overly broad, and is not reasonably calculated to lead to the discovery of admissible evidence regarding the cause of action. DENIED.

REQUEST FOR ADMISSION NO. 27: Admit at the time of YOUR INJURY YOU were

diagnosed with a mental health disorder.

RESPONSE TO REQUEST FOR ADMISSION NO. 27: OBJECTION. This request seeks information protected by the right to privacy and the psychotherapist-patient privilege. DENIED.

REQUEST FOR ADMISSION NO. 28: Admit at the time of YOUR INJURY YOU were enrolled in an alcohol rehabilitation treatment.

RESPONSE TO REQUEST FOR ADMISSION NO. 28: OBJECTION. This request seeks information protected by the right to privacy and is not relevant to the core issues of the Defendant's premises liability and negligence in causing the physical injuries sustained in the fall. DENIED.

REQUEST FOR ADMISSION NO. 29: Admit YOU have presented no evidence proving YOU fell in the LOCATION the night of YOUR injury.

RESPONSE TO REQUEST FOR ADMISSION NO. 29: OBJECTION. This request is premature as discovery is ongoing and improperly asks the Plaintiff to admit a legal conclusion regarding the sufficiency of her evidence. DENIED.

REQUEST FOR ADMISSION NO. 30: Admit YOU are unaware of any evidence proving YOU fell in the LOCATION the night of YOUR injury.

RESPONSE TO REQUEST FOR ADMISSION NO. 30: DENIED.

REQUEST FOR ADMISSION NO. 31: Admit there is no evidence proving YOU fell in the LOCATION the night of YOUR injury.

RESPONSE TO REQUEST FOR ADMISSION NO. 31: OBJECTION. This request is

premature as discovery is ongoing and the investigation into all available evidence is continuing. DENIED.

REQUEST FOR ADMISSION NO. 32: Admit YOU did not fall in the LOCATION the night of YOUR injury.

RESPONSE TO REQUEST FOR ADMISSION NO. 32: DENIED.

REQUEST FOR ADMISSION NO. 33: Admit DEFENDANT is not liable for YOUR INJURIES.

RESPONSE TO REQUEST FOR ADMISSION NO. 33: OBJECTION. This request improperly asks the Plaintiff to admit the ultimate legal issue in the case. DENIED.

DATED: December 2, 2025

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Dawn Calvert", is written over a horizontal line.

Dawn Calvert
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