

REQUESTS FOR ADMISSION

1. Admit that YOU and Holly Bowers offered in writing to purchase the SUBJECT PROPERTY for a total purchase price of \$895,000 on March 27, 2021.
2. Admit that the written offer from YOU and Holly Bowers scheduled the close of escrow for 60 days after contract formation with the seller.
3. Admit that YOU and Holly Bowers formed a written purchase and sale agreement with the seller of the SUBJECT PROPERTY following acceptance of YOUR counteroffer on March 30, 2021.
4. Admit that the purchase price in YOUR counteroffer was \$895,000.
5. Admit that the written contract for purchase and sale for the SUBJECT PROPERTY contained a 17-day buyer-inspection contingency period.
6. Admit that the 17-day buyer-inspection contingency period entitled YOU and Holly Bowers to conduct investigations into the SUBJECT PROPERTY's condition.
7. Admit that the 17-day buyer-inspection contingency period entitled YOU and Holly Bowers to unilaterally cancel the contract.
8. Admit that YOU and Holly Bowers removed all contingencies in writing on April 29, 2021.
9. Admit that YOU wrote emails to the sellers and their real estate agent Kent Weinstein with questions regarding the condition of the SUBJECT PROPERTY before YOU removed all contingencies.
10. Admit that Micah Forstein and Kent Weinstein responded to YOUR emails on or about April 20, 2021.
11. Admit that YOU and Holly Bowers received the Wheeler Termite Co. inspection report before YOU and Holly Bowers removed all contingencies for the purchase of the SUBJECT PROPERTY.
12. Admit that YOU and Holly Bowers received the Winn Home Inspection report before YOU and Holly Bowers removed all contingencies for the purchase of the SUBJECT PROPERTY.
13. Admit that YOU received the 2015 Building Inspection Report for the SUBJECT PROPERTY prepared by Bob Williams before YOU and Holly Bowers

REQUESTS FOR ADMISSION

removed all contingencies for the purchase of the SUBJECT PROPERTY.

14. Admit that YOU had a home inspection report prepared by an inspector of your choosing before YOU and Holly Bowers removed all contingencies for the purchase of the SUBJECT PROPERTY.

15. Admit that on April 23, 2021, YOU requested in writing that the sellers reduce the price of the SUBJECT PROPERTY to \$700,000.

16. Admit that the sellers refused to reduce the price to \$700,000.

17. Admit that escrow for purchase of the SUBJECT PROPERTY closed on May 13, 2021.

18. Admit that YOU and Holly Bowers paid \$895,000 in exchange for a deed to the SUBJECT PROPERTY on May 13, 2021.

19. Admit that YOU are licensed as a contractor in Maryland.

20. Admit that YOU are licensed as a realtor in Maryland.

21. Admit that YOU personally inspected the SUBJECT PROPERTY at least twice before YOU and Holly Bowers removed all contingencies for the purchase of the SUBJECT PROPERTY.

22. Admit that YOU were represented by a California licensed realtor in the purchase of the SUBJECT PROPERTY.

23. Admit that YOU knew before YOU signed the offer that YOU could withdraw from the contract before removing contingencies without penalty.

24. Admit that YOU did not request an extension of time to remove contingencies.

25. Admit that no restriction was placed on the number of inspections YOU or anyone on YOUR behalf could make of the SUBJECT PROPERTY.

26. Admit that no time limit was placed on the hours YOU could spend inspecting the SUBJECT PROPERTY.

27. Admit that YOU understood the phrase "As is" in the CAR agreement when you signed the counteroffer.

28. Admit that YOU read and understood the Wheeler Termite Co. inspection

REQUESTS FOR ADMISSION

report before YOU and Holly Bowers removed all contingencies.

29. Admit that YOU read and understood the 2015 Bob Williams home inspection report before YOU and Holly Bowers removed all contingencies.

30. Admit that YOU knew the home had been vacant for several months before YOU first inspected it.

31. Admit that YOU received a completed Transfer Disclosure Statement from this defendant before YOU and Holly Bowers waived all contingencies.

32. Admit that YOU received a completed Agent's Visual Inspection Disclosure from Kent Weinstein before YOU and Holly Bowers removed all contingencies.

33. Admit that at the time YOU signed the counteroffer, YOU understood that if YOU withdrew from the contract, YOU would receive a return of YOUR deposit and be under no further obligations.

34. Admit that if YOU had withdrawn from the contract during the buyers' contingency period, YOU and Holly Bowers would not have any of the damages alleged in your COMPLAINT against Micah Forstein.

35. Admit that YOU have not had any licensed contractor perform any repairs on the SUBJECT PROPERTY.

36. Admit that YOU were informed of the work done on the SUBJECT PROPERTY by John Chatters before YOU and Holly Bowers removed all contingencies.

37. Admit that YOU were informed of the work done on the SUBJECT PROPERTY by David Woodbury before YOU and Holly Bowers removed all contingencies.

38. Admit that YOU signed the offer and counteroffer before having seen the SUBJECT PROPERTY in person.

39. Admit that YOU did not ask to see any disclosures before signing the offer.

40. Admit that YOU did not ask to inspect the SUBJECT PROPERTY before signing the offer.

41. Admit that YOU did not request any reports before signing the offer.

REQUESTS FOR ADMISSION

42. Admit that no statute requires residential home sellers in California to provide disclosures to potential buyers until an offer has been signed by the buyers.

43. Admit that YOU received all statutorily required disclosures before YOU and Holly Bowers removed all contingencies.

44. Admit that no California licensed real estate appraiser has informed YOU that the SUBJECT PROPERTY is now worth less than it was when YOU and Holly Bowers removed all contingencies.