

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

JORDAN REYES,	:	CASE NO. 2025 CV 01254
1400 CLIFTON AVE.	:	
CINCINNATI, OHIO 45220	:	JUDGE OLIVIA D. EDWARDS
Plaintiff,	:	
 	:	
v.	:	
 	:	<u>REQUESTS FOR ADMISSIONS</u>
DANTE MILES,	:	<u>DIRECTED TO DEFENDANT</u>
3214 BELMONT PARK DR.	:	
DAYTON, OHIO 45424	:	
Defendant.	:	
	:	
	:	

NOW COMES Plaintiff, Jordan Reyes, by and through counsel, requests Defendant, Dante Miles, make the following admissions within twenty-eight (28) days after the date of service hereof. All responses to requests for admission are to be in compliance with Civ. R. 11 and 36. Per *St. Paul Fire and Marine Insurance Company v. Battle*, 44 Ohio App.2d 261 (1975), general denials are not permitted. An award of reasonable attorney’s fees may be sought if required to prove any request for admission denied by the Defendant below. Responses are due to the Law Offices of John C. Pryor 1250 Beech Street, Cincinnati, OH 45202.

INSTRUCTIONS

1. All answers must be made separately and fully and that an incomplete or evasive answer is a failure to answer.
2. You are under a continuing duty to reasonably supplement your responses with respect to any question directly addressed to you, and to correct any responses which you know or later learn are incorrect.

DEFINITIONS

1. “Accident” or “incident” refers to the occurrence on March 15, 2025 at the intersection of 5th and Jefferson in Nashville.
2. “Rider” means any individual who was present in Defendant’s vehicle at any time on the date of the incident, regardless of whether such individual requested or paid for transportation through the Rideshare Application.
3. “Rideshare application” means any mobile or digital platform used by Defendant to accept, manage, or complete requests for passenger transportation, including but not limited to applications such as Zoomzy, and includes all associated data, communications, and records generated or stored by such platform.

REQUEST FOR ADMISSIONS

1. Admit that you were the driver of the 2022 Toyota Camry at the time of the accident.
RESPONSE:
This is not a disputed fact. Opening with this RFA is more of a psychological tactic to begin with questions that are easy to admit and say yes to so that later when you introduce more controversial admissions, their mindset is already geared towards admitting rather than denying. Also, it does help establish who was the driver which is relevant to liability.
2. Admit that no mechanical defects of the 2022 Toyota Camry contributed to the accident.
RESPONSE:
This RFA is to narrow liability solely to the driver by confirming no manufacturing malfunction and thereby eliminate potential defense based on something outside the driver’s control.
3. Admit that no obstructions or visibility issues that interfered with you from seeing a pedestrian in the crosswalk at the intersection of 5th Ave and Jefferson Street on March 15, 2025.
RESPONSE:
Similar to the previous, this RFA attempts to remove other external factors as a defense.

If either of these are denied, it highlights areas where to focus discovery further.

4. Admit that on March 17, 2025, you sent a text message to Plaintiff, Jordan Reyes, stating: “Hey, I heard what happened. Didn’t even see you till the last second. You ok?”
RESPONSE:

This RFA authenticates a text message in which the Defendant admits he noticed the Plaintiff “too late”. It serves as direct evidence of the Defendant’s awareness during the incident.

5. Admit that on March 17, 2025, you sent a text message to Plaintiff, Jordan Reyes, stating: “I didn’t mean to. I was dropping off a rider and she was yelling at me. It all happened so fast.”
RESPONSE:

This RFA is to introduce the driver’s state of mind and begin establishing a narrative that the driver was distracted and may have contributed to the accident.

Dated: April 3, 2026

Respectfully submitted,

/s/ John C. Pryor

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