Discovery: Responding to Requests for Admissions

Requests for admission are used to ask another party to admit that certain facts are true, or that certain documents are authentic. If admitted as true or authentic, these facts and documents do not need to be proven or authenticated at trial. This helps reduce the number of disputed facts that the court needs to decide in the case, making trials quicker and less expensive.

Templates and Forms

- Response to Requests for Admission Template – DOCX (https://saclaw.org/wp-content/uploads/2026/02/sbs-discovery-responding-to-requests-for-admissions-responses.docx)
- Proof of Service by First Class Mail (POS-030) (http://www.courts.ca.gov/documents/pos030.pdf)

The requests for admission that you receive will include a list of statements or facts that the other party wishes you to admit are true. Your answers must be as complete and straightforward as possible (California Code of Civil Procedure (CCP) § 2033.220 (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.220.)), and be accurate to the best of your knowledge. You must sign under penalty of perjury that your responses are true and correct (CCP § 2033.240 (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.240.)).

Related Discovery Guides

Visit our Discovery topic page (https://saclaw.org/legal_topic/discovery-process-to-get-evidence-from-other-side/#research_guides) for a complete list of our discovery guides and videos.

You have 30 days from the date the requests were served to you (35 if served by mail within California) to serve your responses to the requests for admission.

Whether the asking party used the Judicial Council form, *Request for Admissions* (DISC-020), or created their own request on pleading paper, the request will contain a numbered list of facts that you are being asked to admit, and/or a numbered list of documents, which are then also

attached, that you are being asked to admit are genuine. You will need to respond to each of the numbered statements.

There are three basic responses to a request for admission:

Admit. With this answer, you are indicating that the fact is true. If part of a statement is true, you must admit that portion of the statement. Once you admit a fact, it will be considered true throughout the entirety of the case. These facts can only be overturned by filing a complicated motion with the court.

Deny. With this answer, you are indicating that the fact is not true. This may mean that the entire statement is untrue, or that portions are untrue. If the statement is partially true, you must admit the true part(s) of the fact and deny the false part(s) of the fact (CCP § 2033.220(b)(1) & (2) (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.220.)). For example, if the propounding party asks, “Admit that the accident you were involved in on May 4, 2013, was caused by your negligence,” you could admit that you were involved in an accident on that date, but deny that it was caused by your negligence.

If you deny the truthfulness of a fact, the other party will need to prove that fact at trial. **DO NOT** deny all the requests just to make the other party prove every fact. If you are found to have improperly denied a request, the court may order you to pay all attorney’s fees and costs incurred by the other party to prove the fact at trial (CCP § 2033.420(a) (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.420.)). Additionally, if you purposely deny a fact you know to be true, you are committing perjury and opening yourself to possible criminal charges!

Cannot truthfully admit or deny the matters set forth in this request because (s)he does not have knowledge of these matters, and despite reasonable inquiry into the matter by reviewing all of the records and information available to him, to obtain information from which the truth or falsity of the matter might be learned. This is a legalese way of stating that you do not know if the fact is true, and that after carefully reviewing all the evidence available to you, you cannot determine if the fact is true or false. You are required to perform a reasonable investigation of the evidence available to you before making this response (CCP § 2033.220(c) (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.220.)). If you do not, the requesting party may file a motion to have the facts deemed admitted by the court, or a motion to compel further responses, both of which may carry sanctions (monetary penalties) against you. If your failure to investigate results in the fact needing to be proven at trial, the court may

order you to pay all attorney's fees and costs incurred by the other party to prove the fact at trial (CCP § 2033.420(a) (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.420.)).

Sometimes, rather than admitting or denying the truthfulness of a fact, you may object to the request on legal grounds. Common objections to requests for admission include:

The request is impermissibly compound. The propounding party may ask you to admit only one fact per statement. You may object to any request that asks you to admit two or more different facts in a single request. For example, "Admit that you are the owner of a Toyota Corolla with the license plate 7ABC123, and that you were driving it on Highway 50 at 4pm on May 4, 2013," is impermissibly compound. It is asking you to admit two separate facts: that you own the vehicle, and that you were driving it at the specified time.

The request is vague, ambiguous or unintelligible. Sometimes, it is impossible to determine what the propounding party is asking you to admit. In these situations, you may object to the request on the grounds that it is vague, ambiguous or unintelligible. For example, if the propounding party asks, "Admit you were there," you may want to object to the request on these grounds. This request is vague, as it does not provide any specifics about the date or location where they wish you to admit you were.

The request is not reasonably calculated to lead to the discovery of relevant, admissible evidence. All requests for admission must be relevant to the issues in the case. If a request does not lead to the discovery of relevant, admissible evidence, you may object. For example, in a car accident case, if the propounding party asks: "Admit that you were wearing purple socks at the time of the accident," you may want to object to the request. Unless the color of your socks is related to the accident, this request is not likely to lead to relevant evidence in the case.

If only a portion of the request is objectionable, the non-objectionable portion of the request must be answered (CCP § 2033.230(a) (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CCP&sectionNum=2033.230.)). There are many other objections that may be raised in your responses to requests for admission. See the resources listed at the end of this Guide for more information.

Step-by-Step Instructions

1 Carefully Review All the Requests

Review each request to determine the truth of the statement. Be sure to review all the information, documents, and other evidence available to you before answering, to ensure that your responses are accurate and thorough. You may need to research possible objections.

2 Complete Your Response to the Requests for Admission

There is no Judicial Council form for this procedure. Instead, the relevant document must be typed on 28-line pleading paper. A customizable template may be downloaded from this link:

- Response to Requests for Admission (https://saclaw.org/wp-content/uploads/2026/02/sbs-discovery-responding-to-requests-for-admissions-responses.docx)

Your response must include the names of the requesting party and responding party, and the set number of the request. You must respond to each request individually. You do not need to repeat the text of the request, but your responses must be in the same order as the requests, and each response must be labeled with the same number or letter as the request. A sample response is available at the end of this Guide. You may download a customizable template for your response from the link listed above.

3 Make Copies

Make a photocopy of your response for yourself and for each party in the case, other than the propounding party.

4 Have Your Responses Served

Your original response document must be served on the attorney for the propounding party, or directly to the propounding party if he or she is self-represented (*in pro per)*. Courtesy copies should be served on all other attorneys or self-represented parties in the case. Service may be completed by mail, by a person over the age of 18 who is not a party to the case. The person serving your requests must complete a proof of service form, typically a *Proof of Service by First Class Mail* (POS-030) (http://www.courts.ca.gov/documents/pos030.pdf). For more information, see our guide on Proof of Service by Mail (https://www.saclaw.org/resource_library/serving-documents-by-mail/).

5 Retain Your Documents

A photocopy of your responses and the original signed Proof of Service should be retained for your records. If the other party claims you did not respond, you may use these documents to defend yourself against a Motion to Deem Facts Admitted. For more information on that procedure, see our guide on Motions to Deem Facts Admitted (https://www.saclaw.org/resource_library/motion-to-deem-facts-admitted/).

For More Information

On the Web

Introduction to Discovery – Part 3: Responding to Requests for Admissions
(https://www.saclaw.org/video-library/discovery-3-response-to-request-for-admissions/)
Part 3 of this video series from the Sacramento County Public Law Library's Civil Self Help Center will help you understand how to respond to Requests for Admission.

At the Law Library

California Civil Discovery KFC 1020 .H64
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

California Civil Discovery Practice KFC 1020 .C35
Electronic Access: On the Law Library's computers, using *OnLaw.*

California Civil Litigation and Discovery KFC 995 .G674

California Deposition and Discovery Practice KFC 1020 .D44
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

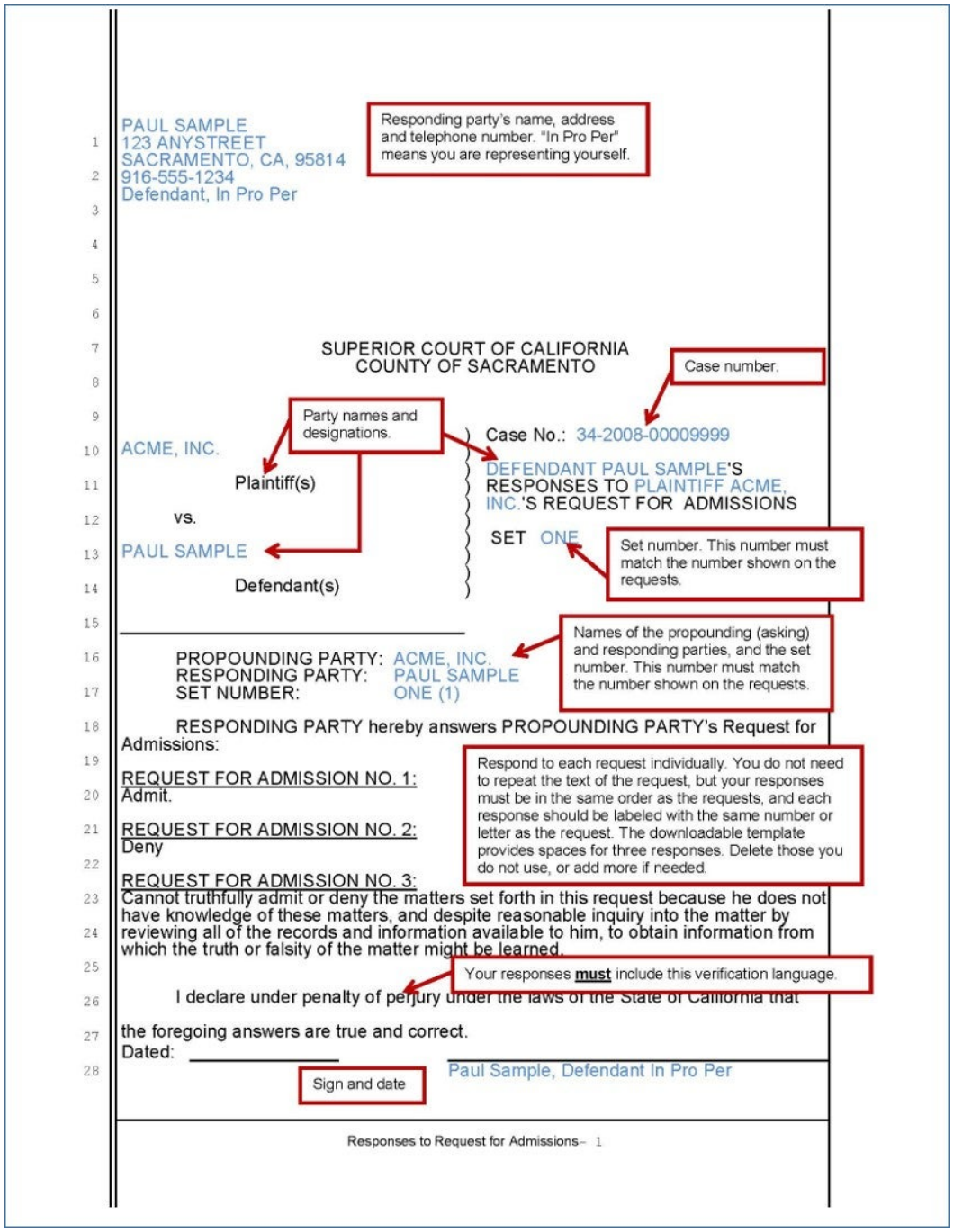
California Discovery Citations KFC 1020 .F56

California Forms of Pleading and Practice KFC 1010 .A65 C3 (Ready Reference)
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

California Practice Guide: Civil Procedure Before Trial KFC 995 .W45

Matthew Bender Practice Guide: California Civil Discovery KFC 1020 .M37

Samples



Responses to Request for Admission

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