

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

FINAL EXPENSE DIRECT,

Plaintiff,

vs.

Case No.: 8:23-cv-2093WFJ-AAS

PYTHON LEADS, LLC, JACQUELYN
LEAH LEVIN, DAVID LEVIN, AND
ALI RAZA,

Defendants.

**DEFENDANT ALI RAZA'S MOTION TO DEEM REQUESTS FOR ADMISSIONS
ADMITTED AGAINST DEFENDANT PYTHON LEADS, LLC**

Defendant, ALI RAZA ("Mr. Raza"), by and through his undersigned counsel, files this Motion to Deem Requests for Admissions Admitted against Defendant, PYTHON LEADS, LLC ("Python"), pursuant to Federal Rule of Civil Procedure 36(a)(3) and Local Rule 3.01, and states as follows:

INTRODUCTION

On July 23, 2025, Defendant Ali Raza duly served upon Python Leads, LLC's counsel of record his Requests for Admission ("RFAs"), a true and correct copy of which is attached as Exhibit A. The RFAs were propounded to establish crucial facts regarding the corporate structure of Python Leads, LLC, the roles and responsibilities of the parties, representations made concerning TCPA insurance, and the allocation of TCPA compliance liability under the relevant agreements.

As of the date of this filing, more than thirty (30) days have passed since service of the RFAs. Python Leads, LLC has failed to serve any responses, objections, or a request for an

extension of time. Accordingly, the matters contained in the RFAs are deemed admitted by operation of Federal Rule of Civil Procedure 36(a)(3).

MEMORANDUM OF LAW

I. LEGAL STANDARD

Federal Rule of Civil Procedure 36(a)(3) provides, in pertinent part: "A matter is admitted unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney." Fed. R. Civ. P. 36(a)(3). Failure to respond to requests for admission within the time provided by Rule 36 results in the admissions being deemed admitted. *See Perez v. Miami-Dade County*, 297 F.3d 1255, 1268 (11th Cir. 2002).

A matter admitted under Rule 36 is "conclusively established unless the court, on motion, permits the admission to be withdrawn or amended." Fed. R. Civ. P. 36(b). The purpose of the rule is to expedite trial by establishing certain material facts as true, thereby narrowing the issues for trial. *Fed. R. Civ. P. 36, Advisory Committee Notes to the 1970 Amendment*.

II. ARGUMENT

Defendant Python Leads, LLC was properly served with Defendant Raza's Requests for Admission on July 23, 2025. The deadline for Python Leads, LLC to serve its responses was August 22, 2025. As of today, October 29, 2025, which is well beyond the 30-day period prescribed by Rule 36, Python Leads, LLC has not served any response whatsoever.

Therefore, pursuant to the clear and mandatory language of Federal Rule of Civil Procedure 36(a)(3), each and every matter set forth in the Requests for Admission attached as Exhibit A is deemed admitted by Python Leads, LLC. These admissions are now conclusively established for the purpose of this litigation.

The admissions sought go to the heart of key issues in this case, including but not limited to:

- A. The management and control of Python Leads, LLC (RFA Nos. 1, 2, 6).
- B. The shifting of TCPA compliance liability from Python to Plaintiff (RFA Nos. 4, 5, 10).
- C. The representations made to Mr. Raza regarding TCPA insurance and his reliance thereon (RFA Nos. 3, 7, 8, 9, 11, 14).
- D. Python Leads, LLC's post-agreement conduct regarding TCPA complaints (RFA No. 13).

The failure of Python Leads, LLC to respond has prejudiced Mr. Raza by leaving these critical facts unresolved and requiring him to potentially expend unnecessary resources to prove matters that are now deemed admitted. Granting this motion will properly reflect the status of the record and streamline the issues for trial.

WHEREFORE, Defendant Ali Raza respectfully requests that this Court enter an Order deeming all matters within his Requests for Admission to Python Leads, LLC, attached as Exhibit A, admitted pursuant to Federal Rule of Civil Procedure 36(a)(3), and for such other and further relief as the Court deems just and proper.

CERTIFICATE OF CONFERENCE

I hereby certify that on October 30th, 2025, I conferred via email with counsel for Python Leads and counsel states Defendant Python Leads opposes the requested in this motion.

/s/ John R. Sutton

JOHN R. SUTTON, ESQ.
Attorney for Defendant Ali Raza

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 30, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ John R. Sutton

JOHN R. SUTTON, ESQ.

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Attorney for Defendant Ali Raza

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FINAL EXPENSE DIRECT,

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PYTHON LEADS, LLC, JACQUELYN
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ALI RAZA,

Defendants.

DEFENDANT ALI RAZA'S REQUESTS FOR ADMISSION TO PYTHON LEADS, LLC
Pursuant to Fed. R. Civ. P. 36 and Local Rule 3.06(b)(9)

COMES NOW the Defendant Ali Raza, by and through the undersigned counsel and pursuant to Federal Rule of Civil Procedure 36 and Local Rule 3.06(b)(9), request that Defendant Python Leads, LLC admit or deny the following within the time allowed by the Rules as follows:

1. Admit that Jacquelyn Leah Levin was the sole managing member of Python Leads LLC at all times relevant to this litigation.

RESPONSE:

2. Admit that Ali Raza was never an officer, director, or legal signatory for Python Leads LLC.

RESPONSE:

3. Admit that Python Leads LLC never provided Ali Raza with written documentation of Berkshire Hathaway TCPA insurance coverage.

Exhibit A

RESPONSE:

4. Admit that the March 2021 Agreement required Python Leads LLC—not Ali Raza—to ensure TCPA compliance for leads provided to Plaintiff.

RESPONSE:

5. Admit that the June 2021 Agreement shifted TCPA compliance liability from Python Leads LLC to Plaintiff Final Expense Direct.

RESPONSE:

6. Admit that Jacquelyn Leah Levin personally signed the June 2021 Agreement on behalf of Python Leads LLC.

RESPONSE:

7. Admit that Jacquelyn Leah Levin orally represented to Ali Raza that Python Leads LLC maintained Berkshire Hathaway TCPA insurance.

RESPONSE:

8. Admit that Python Leads LLC never provided Ali Raza with access to Berkshire Hathaway insurance policies or proof of coverage.

RESPONSE:

9. Admit that Ali Raza's communications to Plaintiff about TCPA insurance were based solely on representations made by Jacquelyn Leah Levin.

RESPONSE:

10. Admit that Plaintiff paid reduced lead rates under the June 2021 Agreement due to assuming TCPA compliance risk.

RESPONSE:

11. Admit that Plaintiff never demanded written proof of Berkshire Hathaway insurance from Python Leads LLC or Ali Raza.

RESPONSE:

13. Admit that Python Leads LLC continued to handle TCPA complaints after June 2021 without notifying Plaintiff of any change in liability.

RESPONSE:

14. Admit that Jacquelyn Leah Levin never corrected Ali Raza's statements about TCPA insurance in writing.

RESPONSE:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 23, 2025October 29, 2025, that the foregoing document is being sent via electronic mail to all parties listed in the service list generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ John R. Sutton

JOHN R. SUTTON, ESQ.

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Service of Court Document Case 8:23-cv-02093-WFJ-AAS Final Expense Direct v. Python Leads, LLC

2 messages

Info @suttonlawgroup.com <info@suttonlawgroup.com> Wed, Jul 23, 2025 at 10:56 AM
To: Alexis Williams <awilliams@anblaw.com>, Marie McAdams <mmcadams@anblaw.com>, Lilia Jaime <ljaime@nhblaw.com>, "Nikki M. Fields" <nfields@nhblaw.com>, tpaecf@cfdom.net, "Ishmail, Zaleena" <zishmail@carltonfields.com>, Brian Koji <bkoji@anblaw.com>, "Bryant S. Banes" <bbanes@nhblaw.com>, "Page, Edward J." <epage@carltonfields.com>, leanna@patriotlegal.com, "T. Patrick Sivertsen" <patrick@tpsseq.com>, Efosa Asemota <easemota@nhblaw.com>
Bcc: Sherry ADEBAYO <lawsherryadebayo@gmail.com>, Taibat Ibrahim <tailegal@yahoo.com>

Defendant Ali Raza hereby propounds the following discovery requests:

- Requests for Admissions to Python Leads, LLC
- Requests for Admissions to Final Expense Direct
- Requests for Admissions to David Levin

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Regards,

Sutton Pomares Law Group, P.A.
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3 attachments

-  **Ali Raza RFAs to Python.docx**
18K
-  **RFAs to F.E.D.docx**
19K
-  **RFAs to David Levin.docx**
18K