

IN THE CIRCUIT COURT                      COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANT

**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
REQUEST OF ADMISSIONS AND REQUEST  
FOR PRODUCTION OF DOCUMENTS  
AND THINGS PROPOUNDED TO DEFENDANT**

Comes now \_\_\_\_\_, Plaintiff, and propounds this his/her First Set of Interrogatories, Request for Admissions and Request for Production of Documents to Defendant to be answered in accordance with Mississippi Rules of Civil Procedure.

INTERROGATORIES

1. State the date, time, and place when you first personally met \_\_\_\_\_.
2. State time, date, and place where you were at the time you ever talked to \_\_\_\_\_.
3. State the place where \_\_\_\_\_ was the first time (s)he talked to you.
4. List in detail, including the date and time, of every telephone conversation that you have had with \_\_\_\_\_ since you initially met \_\_\_\_\_.
5. State the name and address of any financial institutions where you have accounts in which you may deposit or withdraw monies. State the type of account, style of account, and the account number of each.
6. List the balances of all the bank accounts in which you have any interest on \_\_\_\_\_, including the account number and the name and address of each bank.
7. List each credit card that you have or have had the ability to use during the year \_\_\_\_\_, including the account number of each credit card, the date each credit card was used each time during the year \_\_\_\_\_ and what the credit card was used for.
8. State each and every airline trip that you have taken during the year \_\_\_\_\_, including the date and time of the airline and where you got on the airplane and where you got off and the date and time you returned.
9. State each and every airline flight that you know of that was taken by \_\_\_\_\_ during the year \_\_\_\_\_, including the date and time of the departure of that airline and the date and time of the return of that airline.

10. State the name and last known address of every hotel or motel or other location where you have stayed when \_\_\_\_\_ was in the same city during the year \_\_\_\_\_.

11. State the date, time and location of each incident that you had sexual relations with \_\_\_\_\_ during the year \_\_\_\_\_.

12. State the name and address of your employer, including your direct supervisor and his/her name, address and telephone number.

13. Please list any person you intend to call as a witness at the trial of this case. For each person you expect to call as a witness, please state the witness's name, address, whether related to you, and a short summary of the subject matter to which the witness shall testify.

14. State the name and last known address of any expert witness whom you intend to call at the trial of this cause and for each provide the following:

- a. Qualifications;
- b. The subject matter, which the expert will testify on;
- c. The substance of the facts and opinion to which the expert is expected to testify;  
and
- d. The summary of the grounds of each opinion of each of the aforesaid experts.

#### REQUEST FOR ADMISSIONS

1. Admit that \_\_\_\_\_ was the lawfully wedded husband/wife of \_\_\_\_\_ from \_\_\_\_\_ until \_\_\_\_\_.

2. Admit that \_\_\_\_\_ was married to \_\_\_\_\_ for approximately \_\_\_\_\_ ( ) years prior to the relationship that developed between you and \_\_\_\_\_.

3. Admit that you had a sexual relationship with \_\_\_\_\_ while he/she was married to \_\_\_\_\_.

4. Admit that \_\_\_\_\_ and you telephoned each other prior to a sexual relationship developing between you.

5. Admit that on or about \_\_\_\_\_, \_\_\_\_\_ found you and \_\_\_\_\_ at the \_\_\_\_\_.

6. Admit that your interference with \_\_\_\_\_'s relationship with his/her husband/wife has caused the Plaintiff great emotional distress and harm.

7. Admit that as a result of your actions that the minor children have suffered extreme emotions and physical distress and harm.

8. Admit that as a result of your actions that the financial income available to the Plaintiff and his/her children has been reduced.

9. Admit that you have, through sexual enticements, gifts, vacations and travel provided by you to \_\_\_\_\_, destroyed \_\_\_\_\_'s marriage to \_\_\_\_\_.

10. Admit that Plaintiff's minor children are now permanently deprived of the time with their natural father/mother.

11. Admit that the Plaintiff has suffered the loss of love and affection from \_\_\_\_\_.

12. Admit that the Plaintiff has suffered the loss of consortium with \_\_\_\_\_.

13. Admit that the Plaintiff has suffered mental agony and anguish, humiliation, damage to his/her honor and destruction of her family life and wounded pride.

14. Admit that you willfully and intentionally had a sexual relationship with \_\_\_\_\_ during the time that (s)he was married to \_\_\_\_\_.

#### PRODUCTION OF DOCUMENTS AND THINGS

1. Please produce copies of all your check stubs, bank statements and any other information for any account that you had with any financial institution during the year \_\_\_\_\_.

2. Please produce copies of all your credit card bills for the year \_\_\_\_\_.

3. Please produce copies of all your airline tickets for the year \_\_\_\_\_.

4. Please produce copies of all your hotel bills for the year \_\_\_\_\_.

5. Please produce copies of all your telephone bills for the year \_\_\_\_\_.

6. Please produce a copy of your State and Federal income tax return for the years \_\_\_\_\_ and \_\_\_\_\_.

7. Please produce copies of your check stubs from your employment during the year \_\_\_\_\_.

8. Please produce copies of any vacation schedule or any documentation showing any vacation that you have taken during the year \_\_\_\_\_.

Respectfully submitted,

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Attorney for



CERTIFICATE OF SERVICE

I, \_\_\_\_\_, attorney for \_\_\_\_\_, do hereby certify that I have this date mailed, postage prepaid, a true and correct copy of the above and foregoing Plaintiff's First Set of Interrogatories, Request for Admissions and Request for Production of Documents and Things to

This the \_\_\_\_\_ day of \_\_\_\_\_.

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