

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

, a Mississippi Corporation

VS.

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF:

, DECEASED, A/K/A Mr./Ms. ,  
A/K/A ,

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF

, DECEASED;

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF

, , , , AND

REQUESTS FOR ADMISSIONS

COMES NOW, , by and through its attorney of record makes the Requests for Admissions unto , as hereinafter set out, pursuant to and in accordance with Rules 36, and 37, of the Mississippi Rules of Civil Procedure, to wit:

1. In the absence of a court judgment to the contrary the admitting party shall have thirty (30) days after service of this Request in which to admit or deny the Requests below, unless the Requests below are served upon the admitting party within fifteen (15) days after the date of being summoned, in which event the admitting party shall respond no later than forty-five (45) days after having been summoned.

2. If no response is made by the admitting party as is above set out, the matter is admitted.

3. If an objection is made, the reasons therefore shall be stated.

4. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party truthfully cannot admit or deny the matter. A denial shall fairly meet the substance of the requested admission and when good faith requires that a party qualify his/her answer or deny only a part of the matter of which an admission is requested, he/she shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless he/she states that he/she has made reasonable inquiry and that the information known or readily obtainable by him/her is insufficient to enable him/her to admit or deny. A party who considers that a matter of which an admission has been requested presents a genuine issue for trial may

not, on that ground alone, object to the request; he/she may, subject to Rule 37 MRCP deny the matter or set forth reasons why he/she cannot admit or deny it.

5. If a party fails to admit the genuineness of any document or the truth of any matter as requested under Rule 36 MRCP, and if the party requesting the admissions thereafter proves the genuineness of the document or the truth of the matter, he/she may apply to the court for an order requiring the other party to pay him/her the reasonable expenses incurred in making the proof, including reasonable attorney's fees.

REQUEST NUMBER ONE:

REQUEST NUMBER TWO:

REQUEST NUMBER THREE:

REQUEST NUMBER FOUR:

REQUEST NUMBER FIVE:

REQUEST NUMBER SIX:

REQUEST NUMBER SEVEN:

REQUEST NUMBER EIGHT:

REQUEST NUMBER NINE:

REQUEST NUMBER TEN:

REQUEST NUMBER ELEVEN:

REQUEST NUMBER TWELVE:

REQUEST NUMBER THIRTEEN:

REQUEST NUMBER FOURTEEN:

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for