

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CAUSE NO.

, Individually,  
and

DEFENDANT

DEFENDANT'S RESPONSE TO  
PLAINTIFF'S REQUESTS FOR ADMISSIONS

COMES NOW the Defendant and files this his/her Response to Plaintiff's Requests for Admissions and in support thereof would show as follows:

By agreement of the parties, the time for responding to said Requests is now due on , , and Defendant responds as follows:

REQUEST NO. 1: Admit or deny that prior to , , was a corporation, doing business in Mississippi, and in good standing with the Mississippi Secretary of State's office.

RESPONSE:

REQUEST NO.2: Admit or deny that was a Mississippi corporation in good standing between the periods of , through , .

RESPONSE:

REQUEST NO. 3: Admit or deny that you held the position and functioned in the role of for between , and , .

RESPONSE:

REQUEST NO. 4: Admit or deny that on , , the Mississippi Secretary of State administratively dissolved .

RESPONSE:

REQUEST NO.5: Admit or deny that you executed a Bill of Sale on , which sold, conveyed and warranted to , an undivided ( ) interest in certain property situated in County, Mississippi which was referenced as Exhibit A" to the Bill of Sale and that Exhibit "A" was entitled " . Equipment Inventory List".

RESPONSE:

REQUEST NO.6: Admit or deny that the equipment and inventory referenced in Request No. 5 was equipment and inventory, which was owned and controlled by \_\_\_\_\_ as of \_\_\_\_\_, \_\_\_\_\_.

RESPONSE:

REQUEST NO. 7: Admit or deny that you were not involved in any other business, partnership/corporation or the like other than your involvement with \_\_\_\_\_ during the years \_\_\_\_\_ through \_\_\_\_\_.

RESPONSE:

REQUEST NO. 8: Admit or deny that prior to \_\_\_\_\_, \_\_\_\_\_, was a former of \_\_\_\_\_ denies that corporation, operation as \_\_\_\_\_.

RESPONSE:

REQUEST NO. 9: Admit or deny that the Bill of Sale executed by you on \_\_\_\_\_, \_\_\_\_\_ effectively transferred to Plaintiff the former \_\_\_\_\_ ( \_\_\_\_\_ ) interest owned by prior to his/her withdrawal/separation from \_\_\_\_\_.

RESPONSE:

REQUEST NO. 10: Admit or deny that you negotiated a \$ \_\_\_\_\_ check made payable to you by Plaintiff.

RESPONSE:

REQUEST NO. 11: Admit or deny that during the years of \_\_\_\_\_ and/or \_\_\_\_\_, you established a bank account separate and apart from the account maintained on behalf of \_\_\_\_\_.

RESPONSE:

REQUEST NO. 12: Admit or deny that you deposited corporate and/or partnership funds in the account(s) referenced in Request for Admission No. 11.

RESPONSE:

REQUEST NO. 13: Admit or deny that you currently retain certain items of equipment which were originally placed at your disposal for business use by the Plaintiff.

RESPONSE:

REQUEST NO. 14: Admit or deny that following \_\_\_\_\_'s departure from \_\_\_\_\_ that you were the sole remaining officer of the corporation.

RESPONSE:

REQUEST NO. 15: Admit or deny that subsequent to \_\_\_\_\_'s departure from \_\_\_\_\_ you had the sole responsibility for maintaining all corporate records and for maintaining and controlling its corporate assets on behalf of \_\_\_\_\_.

RESPONSE:

REQUEST NO. 16: Admit or deny that \_\_\_\_\_ is currently exercising control and possession over items of equipment originally placed at your disposal for business use by the Plaintiff.

RESPONSE:

REQUEST NO. 17: For all equipment relevant to Request No. 15, admit or deny that you have sold such equipment subsequent to Plaintiff's disassociation with you.

RESPONSE:

REQUEST NO. 18: Admit or deny that \_\_\_\_\_ never issued any stock, common or otherwise, to Plaintiff.

RESPONSE:

REQUEST NO. 19: Admit or deny that \_\_\_\_\_ was never elected as an officer of \_\_\_\_\_, or elected to a director's position in the corporation.

RESPONSE:

REQUEST NO. 20: Admit or deny that you previously valued \_\_\_\_\_ and/or your partnership with Plaintiff at \$ \_\_\_\_\_.

RESPONSE:

Any further response concerning settlement negotiations are not admissible under Rule 408 of the Mississippi Rules of Civil Procedure.

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for

STATE OF MISSISSIPPI  
COUNTY OF

Personally came and appeared before me, the undersigned authority in and for the jurisdiction aforesaid, \_\_\_\_\_, who, being by me first duly sworn, stated on his/her oath that the matters and facts set forth in the above and foregoing Defendant's Response to Plaintiff's Request for Admissions are true and correct as therein stated.

SWORN TO AND SUBSCRIBED BEFORE \_\_\_\_\_, this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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NOTARY PUBLIC

My Commission Expires:

CERTIFICATE OF SERVICE

I, \_\_\_\_\_ do hereby certify that I have this day mailed a true and correct copy of the above and foregoing **DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUESTS FOR ADMISSIONS** to the following counsel of record:

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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