

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

and

vs.

NO.

and

MOTION TO AMEND

The defendants respectfully move the Court for an order pursuant to MRCP 15(a), granting them leave to amend the Counterclaim asserted in their Answer to Amended Complaint and Counterclaim, and to add as a counter plaintiff herein.

1. has loaned the sum of \$ to and . These liabilities were transferred to and assumed by the plaintiffs pursuant to sale contemplated in the Contract made the subject of this suit. should be made a counter plaintiff herein so that complete relief can be afforded among the parties to this action.

2. The defendants should be granted leave to amend the Counterclaim asserted in their Answer to Amended Complaint and Counterclaim by filing the proposed Amended Counterclaim attached hereto as Exhibit "A".

WHEREFORE, PREMISES CONSIDERED, the movants respectfully request that be made a party counter plaintiff to this action, and that the defendants be permitted to amend the Counterclaim asserted in their Answer to Amended Complaint and Counterclaim by filing the proposed Amended Counterclaim attached hereto as Exhibit "A".

Respectfully submitted,

Attorney for

Of counsel:

Telephone:
MSB #
Attorney for