

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

, FORMERLY KNOWN AS

VS.

NO.

THE ESTATES OF , AND

MOTION TO INTERPLEAD FUNDS

COMES NOW the Plaintiff, , and files this, its Motion to Interplead Funds, and in support hereof would show as follows:

1.

On , 20 , Plaintiff filed a Complaint for Declaratory Judgment and Interpleader Action in this matter.

2.

Pursuant to this action, Plaintiff has requested the Court to declare the rights, status, or other legal relations under the documentation attached as exhibits to the Complaint.

3.

There is no issue that the Plaintiff is to pay the \$ face value of the life insurance policy on the life of . However, Defendants have not made a request for the funds. Plaintiff believes that the failure to request the funds is due to the issues sought to be resolved in the Declaratory Judgment proceeding.

4.

Plaintiff's counsel has been informed by the County Chancery Clerk's office that an Order of the Court is required to permit them to accept tender of the interpleader funds.

5.

Based on the foregoing, Plaintiff requests permission of the Court to interplead the \$ funds into the Registry of the Court. A copy of a check for the interplead funds is attached as Exhibit "A".

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that this Court issue an order permitting the County Chancery Clerk's office to accept the sum of \$ as funds interplead into the Registry of this Court pursuant to this action. Plaintiff requests further, other and different relief as is reasonable and proper in the premises.

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for