

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANTS

**DEFENDANTS RESPONSES AND OBJECTIONS TO PLAINTIFF'S  
FIRST SET OF INTERROGATORIES**

COMES NOW, Defendants, and , by and through their attorney of record, in responding to Plaintiff's First Set of Interrogatories, and states as follows:

INTERROGATORY NO. 1: Please state the full name and address of each person supplying information and/or answering these interrogatories.

RESPONSE TO INTERROGATORY NO. 1:

INTERROGATORY NO. 2: Please state the name, address and telephone number of each and every person you intend calling as a witness at the trial of this cause.

RESPONSE TO INTERROGATORY NO. 2:

INTERROGATORY NO. 3: Identify each expert you intend to call as an expert witness at the trial of this cause, and state the subject matter upon which he or she is expected to testify,

the substance of the facts, and a summary of the grounds for each opinion.

RESPONSE TO INTERROGATORY NO. 3:

INTERROGATORY NO. 4: Please state the name, address, telephone number and relationship to Defendants of every person who may have knowledge of the facts complained of in this proceeding.

RESPONSE TO INTERROGATORY NO. 4:

INTERROGATORY NO. 5: Identify all experts and/or consultants from whom you have obtained any opinion concerning any matter involved in this litigation and describe the purpose(s) for which each such expert or consultant was retained or specially employed.

RESPONSE TO INTERROGATORY NO. 5:

INTERROGATORY NO. 6: Identify each document, which you intend to offer into evidence at trial.

RESPONSE TO INTERROGATORY NO. 6:

INTERROGATORY NO. 7: What was the net worth of \_\_\_\_\_ on \_\_\_\_\_, \_\_\_\_\_ and on \_\_\_\_\_, \_\_\_\_\_.

RESPONSE TO INTERROGATORY NO. 7:

INTERROGATORY NO. 8: Please explain the basis for the values given in your answer to interrogatory number 7 above. Also, identify each and every document or financial record, which supports your answer.

RESPONSE TO INTERROGATORY NO. 8:

INTERROGATORY NO. 9: Explain in detail the consideration paid by \_\_\_\_\_ in exchange for the issuance of 510 shares of common stock of \_\_\_\_\_ in his/her name.

RESPONSE TO INTERROGATORY NO. 9:

INTERROGATORY NO. 10: Explain in detail the consideration paid by \_\_\_\_\_ in exchange for the issuance of \_\_\_\_\_ shares of common stock of \_\_\_\_\_ in his/her name.

RESPONSE TO INTERROGATORY NO. 10:

INTERROGATORY NO. 11:Identify the compensation received by \_\_\_\_\_ from  
each month from \_\_\_\_\_, \_\_\_\_\_ through \_\_\_\_\_, \_\_\_\_\_.

RESPONSE INTERROGATORY NO. 11:

INTERROGATORY NO. 12:Identify the compensation received by \_\_\_\_\_ from  
each month from \_\_\_\_\_, \_\_\_\_\_ through \_\_\_\_\_, \_\_\_\_\_.

RESPONSE TO INTERROGATORY NO. 12:

INTERROGATORY NO. 13:Explain in detail the reasons \_\_\_\_\_ was terminated as an  
employee of \_\_\_\_\_ on or about \_\_\_\_\_, \_\_\_\_\_.

RESPONSE TO INTERROGATORY NO. 13:

THIS, the            day of            , 20            .

Respectfully submitted,

\_\_\_\_\_

\_\_\_\_\_

AS TO OBJECTIONS:

\_\_\_\_\_

CERTIFICATE OF SERVICE

This is to certify that I,            , counsel for defendants, have mailed this day by U.S. Mail, postage prepaid, and transmitted via facsimile, a true and correct copy of the above and foregoing to            , Attorney for Plaintiff, at            and facsimile number            .

This the            day of            ,            .

\_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF

PERSONALLY came and appeared before me, the undersigned in and for the jurisdiction aforesaid, the within named \_\_\_\_\_ in the above and foregoing instrument of writing, who acknowledged to me that he/she signed and delivered the above foregoing instrument of writing on the day and in the year and for the purposes therein mentioned.

GIVEN under my hand and official seal of office on this the \_\_\_\_\_ day of \_\_\_\_\_ .

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:  
\_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF

PERSONALLY came and appeared before me, the undersigned in and for the jurisdiction aforesaid, the within named \_\_\_\_\_ in the above and foregoing instrument of writing, who acknowledged to me that he/she signed and delivered the above foregoing instrument of writing on the day and in the year and for the purposes therein mentioned.

GIVEN under my hand and official seal of office on this the \_\_\_\_\_ day of \_\_\_\_\_  
20 \_\_\_\_\_ .

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:  
\_\_\_\_\_