

**IN THE CIRCUIT COURT OF**

**COUNTY, MISSISSIPPI**

**INDIVIDUALLY AND FOR  
AND**

**VS.**

**CASE NO.**

**AND**

**DEFENDANT'S SUPPLEMENT TO INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants hereby supplement their interrogatories and request for production of documents, as follows:

**INTERROGATORIES**

**INTERROGATORY NO. 4:** Set forth in narrative form the basis for your affirmative defense that Plaintiffs' claim with respect to percentage of stock ownership and ownership of the real property at issue are barred by the statute of limitations.

**SUPPLEMENTED RESPONSE:**

**INTERROGATORY NO.5:** Set forth in narrative form the basis for your contention that Plaintiffs' claims are barred in whole or part by the statute of limitations.

**SUPPLEMENTED RESPONSE:**

**INTERROGATORY NO. 6:** Set forth in narrative form the basis for your contention that the allegations and Complaint are barred by the doctrine of laches.

**SUPPLEMENTED RESPONSE:**

**INTERROGATORY NO. 7:** Set forth in narrative form the basis for your contention that Plaintiffs' have no standing in their individual capacity to seek the alleged damages describe

in the Complaint set forth in narrative form the basis for your affirmative defense that the allegations contained in the Complaint are barred by the doctrine of waiver.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 8: Set forth in narrative form the basis for your affirmative defense that the Complaint is barred by the doctrine of estoppel.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 13: Set forth in narrative form the basis or justification for the bonuses, which Mr. \_\_\_\_\_ received for the period from \_\_\_\_\_, \_\_\_\_\_, to \_\_\_\_\_, \_\_\_\_\_.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 14: Set forth in narrative form the basis or justification for the bonuses Mr./Ms. \_\_\_\_\_ received for the period from \_\_\_\_\_, \_\_\_\_\_, to \_\_\_\_\_, \_\_\_\_\_.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 15: Set forth in narrative form the basis or justification for the bonuses which Mr./Ms. \_\_\_\_\_ received for the period from \_\_\_\_\_, \_\_\_\_\_, to \_\_\_\_\_, \_\_\_\_\_.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 16: Set forth in specific detail why  
was paid no bonus, dividend or other compensation related to the profits of the company for the  
period from \_\_\_\_\_, to \_\_\_\_\_, \_\_\_\_\_.

SUPPLEMENTED RESPONSE:

INTERROGATORY NO. 17: Set forth in specific detail why  
received no distribution of profits or earnings from the Company for the period \_\_\_\_\_, \_\_\_\_\_, to  
\_\_\_\_\_, \_\_\_\_\_.

SUPPLEMENTED RESPONSE:

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for

STATE OF MISSISSIPPI

COUNTY OF

Personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named \_\_\_\_\_, who being by me first duly sworn stated on oath that he/she signed the above and foregoing Answer and Defenses of Defendants and that the matters and things contained therein are true and correct to the best of his/her knowledge, information and belief.

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

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

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