

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

and PLAINTIFFS

VS. CIVIL ACTION NO.

DEFENDANT

**PLAINTIFFS' FIRST INTERROGATORIES, REQUEST FOR
ADMISSIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT**

Come now plaintiffs, pursuant to the Mississippi Rules of Civil Procedure, and propound herewith the following discovery to the defendant, to-wit:

INTERROGATORY NO. 1: Give the name and address of all persons having knowledge of any discoverable matter relating to the issues raised in the complaint.

INTERROGATORY NO.2: Give the name and address of each person whom you expect to call as an expert witness at the trial of this cause, and for each expert so listed, please state:

- (a) the subject matter on which the expert is expected to testify;
- (b) the substance of the facts and opinions to which the expert is expected to testify;
- (c) a summary of the grounds for each opinion; and
- (d) the qualifications which you contend make each person an expert. Alternatively, you may attach a copy of such person's curriculum vita to your answer.

INTERROGATORY NO. 3: If oral, written, recorded or transcribed statements, or statements of any other nature, have been obtained by any person with regard to the subject of this lawsuit, please state:

- (a) The name, address, telephone number and place of employment of each person from whom a statement has been obtained;
- (b) The date on which each statement was obtained; and
- (c) The name, address, telephone number and place of employment of each person now in possession of the original or a copy of each statement described hereinabove.

INTERROGATORY NO. 4: Explain in chronological order and complete factual detail exactly what legal or other services you rendered in behalf or for the benefit of plaintiffs.

INTERROGATORY NO. 5: Explain fully why plaintiffs' adoption of birth mother " " child was not completed, being the one you handled for plaintiffs.

INTERROGATORY NO. 6: What was the total amount of money you received either directly from plaintiffs or on behalf of plaintiffs through the office of attorney _____ ?

INTERROGATORY NO. 7: Itemize all expenses you incurred on behalf of plaintiffs, including dates, amounts, identities of recipients of your funds, and specific purposes for which your funds were expended.

INTERROGATORY NO. 8:

INTERROGATORY NO. 9:

INTERROGATORY NO. 10: Furnish an accounting of all receipts and disbursements of plaintiffs' money, including money you received from _____ on plaintiffs' behalf.

INTERROGATORY NO. 11: Of the aforesaid amount, how much did you refund?

INTERROGATORY NO. 12: Do you acknowledge that plaintiffs are entitled to an additional refund from you? If so, in what amount?

INTERROGATORY NO. 13: Of the amount you presently retain, specify exactly what the amount retained is for.

INTERROGATORY NO. 14: If you contend you are entitled to retain any of plaintiffs' money, either as a fee or reimbursement of expenses, or for any other purpose, please explain why in complete detail.

INTERROGATORY NO. 15: Did you represent either directly to plaintiffs or to attorney _____ acting on their behalf that you had located a child who was available for adoption by plaintiffs?

INTERROGATORY NO. 16: Give the full names, addresses and telephone numbers of the natural parents of such child referred to in the immediately preceding interrogatory.

INTERROGATORY NO. 17: What was the total amount you told either plaintiffs or attorney _____ on behalf of plaintiffs that would be required to effect the child's adoption by plaintiffs?

INTERROGATORY NO. 18: Did you ever represent to any other person that this same child was available for adoption by persons other than plaintiffs?

INTERROGATORY NO. 19: If the answer to the immediately preceding interrogatory is in the affirmative, to whom and when were such representations made, and what was the "asking price" for the child?

INTERROGATORY NO. 20: Who was Sonya's said child adopted by?

INTERROGATORY NO. 21: State the names, addresses and telephone numbers of all persons who were either your law partners or who were employed by you at your law office during the period beginning when you first communicated with _____ and ending on the date you served your responses to this discovery.

INTERROGATORY NO. 22: Give the names and addresses of all other persons who have filed complaints against you in connection with adoptions, either in Court or with the Mississippi Bar Association.

INTERROGATORY NO. 23: State the name, location, street address and apartment number of the apartment you claim to have rented so plaintiffs could establish Mississippi residency for purposes of the adoption.

INTERROGATORY NO. 24: State the name, address and telephone number of the person or other entity from whom you rented the aforesaid apartment.

INTERROGATORY NO. 25: Explain in detail all business and/or personal connections you have with the person or entity referred to in Interrogatory No. 23.

INTERROGATORY NO. 26: What is your current net worth?

Requests for Production of Documents

(All documents are requested to be produced in the office of Hon. _____, on _____, _____, at _____ a.m., or at such other time, date and location as the parties through counsel may agree).

REQUEST NO. 1: Produce your entire file relating to plaintiffs.

REQUEST NO. 2: Produce copies of your Federal and State income tax returns for 1991 and 1992.

REQUEST NO. 3: Produce all records for _____ and _____ of all bank accounts in your name or in which you own an interest, both personal and business, including checking accounts, savings accounts and certificates of deposit and law office trust accounts. Such records should include, but not be limited to, bank statements, canceled checks, checkbook stubs, deposit slips and all other records of deposits.

REQUEST NO. 4: Produce any and all other records pertaining to assets held solely in your name, or in your name jointly with another person.

REQUEST NO. 5: Produce a copy of your most recent financial statement of the type commonly provided to banks.

REQUEST NO. 6: Produce a copy of the curriculum vita of any person you intend to call as an expert witness at trial.

REQUEST NO. 7: Produce a copy of any statements referred to in Interrogatory No. 3 above.

Requests for Admissions

REQUEST NO. 1: Plaintiffs paid you, through _____, a total of \$ _____ in advance for the adoption of " _____ " child.

REQUEST NO. 2:

REQUEST NO. 3:

REQUEST NO. 4:

REQUEST NO. 5: The adoption was not completed. You are retaining money belonging to _____.

REQUEST NO. 6: The failure of the adoption to be completed was not in any way the fault of plaintiffs.

REQUEST NO. 7: You offered " _____ " child for adoption by another couple, being the subject of adoption by plaintiffs.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for