

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

and DEFENDANTS

**PLAINTIFF'S FIRST SET OF REQUEST FOR ADMISSIONS
TO DEFENDANTS**

COMES NOW Plaintiff, , by and through counsel, and propounds his/her First Set of Request for Admissions to the defendant , pursuant to M.R.C.P. and would ask that they be answered in the manner and time as set forth in said Rules:

1. Please admit that was a patient in your hospital emergency department on , .
2. Please admit that you undertook to render treatment and care to .
3. Please admit that the employees and/or agents of your facility failed to properly diagnose and treat Plaintiff.
4. Please admit that your employees and/or agents were aware or should have been aware that Plaintiff had suffered a fracture to his/her .
5. Please admit that the x-ray of Plaintiff's taken at your facility on , , reflects that the was fractured.
6. Please admit that the report rendered by indicated that plaintiff has no bone or joint abnormalities noted.
7. Please admit that your employees and/or agents were negligent when they did not properly read the x-ray and properly treat plaintiff.
8. Please admit that said employee(s) and/or agent(s) were acting for and on your behalf at the time of this negligent act.
9. Please admit that you are a facility which purports to provide treatment to the general public which is comparable and/or superior to other hospitals in the area and hold yourself out in the community in such capacity.
10. Please admit that due to your negligence Plaintiff was damaged.
11. Please admit that the damage Plaintiff incurred was the result of your employees' failure to follow medically accepted procedures.

12. Please admit that this incident was not an isolated occurrence and that other similar incidents have occurred within the last () years.

The foregoing request for admissions are directed to the Defendant, , on this, the day of , .

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for