

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

APPELLANT

VS.

CIVIL ACTION NO.

MISSISSIPPI EMPLOYMENT SECURITY
COMMISSION AND APPELLEE

'S RESPONSE TO MOTION FOR SUMMARY JUDGMENT

Appellee submits this response to the motion for summary judgment filed by

1. Appellee denies the allegations contained in paragraph 1 of the motion for summary judgment.

2. Appellee denies the allegations contained in paragraph 2 of the motion for summary judgment.

3. Appellee denies the allegations contained in paragraph 3 of the motion for summary judgment.

4. Appellee denies the allegations contained in paragraph 4 of the motion for summary judgment.

5. The motion for summary judgment must be denied because the moving party, , has to satisfy the requirements for granting summary judgment. Pursuant to Rule 56(h) of the Mississippi Rules of Civil Procedure, Mr./Ms is therefore entitled to an award of the reasonable expenses incurred in attending the hearing of this motion. Further, because the motion is without reasonable cause, Mr./Ms is entitled to an award of attorneys' fees.

WHEREFORE, PREMISES CONSIDERED, Appellee requests that the Court deny the motion for summary judgment and enter an order directing to pay the reasonable costs incurred in connection with opposing the motion for summary judgment.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for