

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

**FIRST SET OF REQUESTS FOR ADMISSIONS
PROPOUNDED BY PLAINTIFF TO DEFENDANT**

The Plaintiff propounds this his/her First Set of Requests for Admissions pursuant to Rule 36 of the Mississippi Rules of Civil procedure, requesting that the Defendant admit or deny the truthfulness of said requests within () days of service hereof.

DEFINITIONS

The term "accident" as used occurrence described in the complaint herein means the
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REQUESTS FOR ADMISSIONS

Request No. 1: That Defendant was the operator of the automobile that collided with the rear of Plaintiff's automobile on , .

Request No. 2: That Defendant was the owner of the automobile that collided with the rear of Plaintiff's automobile on , .

Request No. 3: That on , , Defendant, into the rear of Plaintiff's drove his/her automobile.

Request No. 4: That Defendant drove his/her automobile into the rear of Plaintiff's automobile.

Request No. 5: That the front of the automobile collided with the rear of the automobile.

Request No. 6: That Plaintiff's automobile was stopped at the time of the accident.

Request No 7: That Plaintiff's automobile was stopped when Defendant drove his/her automobile into the rear of plaintiff's automobile.

Request No. 8: That at the time of the accident failed to have his/her automobile under proper control.

Request No. 9: That at the time of the accident Defendant failed to maintain a proper lookout.

Request No. 10: That at the time of the accident Defendant failed to maintain a reasonable distance behind Plaintiff's automobile so as to avoid colliding with Plaintiff's automobile.

Request No. 11: That at the time of the accident Defendant was negligent as a matter of law in violating Section 63-3-619(1) of the Mississippi Code Annotated (1972).

Request No 12: That Defendant was negligent in colliding with the rear of Plaintiff's vehicle.

Request No. 13: That the accident was proximately caused by Defendant's failure to keep his/her vehicle under control, keep a proper look-out ahead, and to drive at a speed and sufficient distance behind Plaintiff's automobile to avoid colliding with Plaintiff's automobile.

Request No 14: That at the time of the accident made the subject of this suit, Plaintiff's automobile was stopped at the intersection of and .

Request No 15: That at the time of the accident the brake lights on Plaintiff's automobile were functioning.

Request No 16: That at the time of the accident Defendant negligently drove his/her automobile into the rear of Plaintiff's automobile.

Request No. 17: That Defendant proximately caused the accident.

Request No. 18: That Defendant proximately contributed .

Respectfully submitted,

By:_____

Attorney for

CERTIFICATE OF SERVICE

I, _____ do hereby certify that I have this day mailed a true and correct copy of the above and foregoing **FIRST SET OF REQUESTS FOR ADMISSIONS PROPOUNDED BY PLAINTIFF TO DEFENDANT** to the following counsel of record:
