

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

AND PLAINTIFFS

VS.

NO.

DEFENDANT

REQUESTS FOR ADMISSION

Pursuant to Miss. R. Civ. P. 36, files its Requests for Admission to be answered in full accordance with such rule, including the requirement that the answer shall specifically deny the matter or set forth in detail why the party cannot truthfully admit or deny the matter.

1. Admit that has no personal knowledge concerning his allegation, as stated in the Affidavit, attached as Exhibit 1 to Plaintiffs' Response to Defendant's Motion for Partial Summary Judgment, that was called for pre-certification of admission to and that approved his admission.

2. Admit that file kept by , as produced to counsel for , contains no documents indicating was called for pre-certification of admission, and that approved his/her admission.

3. Admit that did not contact to pre-certify the admission of to in , .

4. Not including the one day of , , for which admits having preliminary pre-certified stay, admit that the Plaintiffs have no witnesses that can testify of their own personal knowledge that pre-certified stay at for , .

5. Not including the one day of , , for which admits having preliminary pre-certified stay, admit that the Plaintiffs have no documents that show that pre-certified stay at for , .

6. Admit that on , , told counsel for that he/she did not have any independent knowledge as to whether admission to in , , was pre-certified by .

7. Admit that during his/her stay at , the medical records reveal that temperature was never greater than F.

8. Admit that prior to admitting , did not review his/her medical records from his/her earlier admission on , , and discharge on , from .

9. Admit that prior to admitting him/her to _____, _____ did not confer with attending physician at _____, _____.

DATED, this the _____ day of _____, _____.

Respectfully submitted,

BY: _____

CERTIFICATE OF SERVICE

I, _____ hereby certify that I have this day caused to be mailed by United States mail, postage prepaid, a true and correct copy of the above and foregoing REQUESTS FOR ADMISSION to the following counsel of record:

This the _____ day of _____, _____.
