

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

, A MINOR, BY AND THROUGH PARENTS,
and , PLAINTIFF

VS. NO.

, DEFENDANT

DEFENDANT'S RESPONSE TO PLAINTIFF'S SECOND
SET OF REQUEST FOR ADMISSIONS

COMES NOW Defendant, and responds to Plaintiff's Second of Request For Admissions, as follows, to-wit:

REQUEST NO 1.: That plaintiff is years old.

RESPONSE: Admitted

REQUEST NO 2: That clean the glass door.

RESPONSE: Denied as .

REQUEST NO. 3: That "get that up high."

RESPONSE: Denied as .

REQUEST NO. 4: That time of the accident.

RESPONSE: Admitted

REQUEST NO 5: That plaintiff was not told what method to use to reach the top portion of the glass door.

RESPONSE: This defendant objects to Request No. 5 inasmuch as this defendant was not aware that the plaintiff was cleaning the top portion of the glass door. Therefore, this defendant denies the Request as phrased because this defendant did not inform the plaintiff to reach the top portion of the glass door.

REQUEST NO. 6: That plaintiff received severe traumatic injuries.

RESPONSE: Denied as phrased.

REQUEST NO. 7: That defendant was "careless" in the care of plaintiff.

RESPONSE: Denied

REQUEST: That plaintiff suffered a ruptured spleen as a result of the incident.

RESPONSE: This defendant admits that he/she has been informed that plaintiff suffered a ruptured spleen as a result of the accident, and as long as the medical records of the examining, treating and/or consulting physicians reflect that plaintiff did suffer a ruptured spleen, this defendant admits same. If, however, such medical records reflect otherwise, this defendant denies this Request.

Respectfully submitted,

, DEFENDANT

BY: _____

,
His/Her Attorney

OF COUNSEL:

CERTIFICATE OF SERVICE

I, _____, hereby certify that I have this day mailed, by United States mail, postage prepaid, a true and correct copy of Defendant's Response to Plaintiff's Second Set of Request for Admissions to:

This the _____ day of _____, _____.
