

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ COUNTY, \_\_\_\_\_

\_\_\_\_\_, a Corporation )

V. )

NO. \_\_\_\_\_

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF: )

\_\_\_\_\_, DECEASED, \_\_\_\_\_ A/K/A )

MRS. \_\_\_\_\_, )

\_\_\_\_\_ A/K/A \_\_\_\_\_, \_\_\_\_\_ )

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF  
\_\_\_\_\_, DECEASED; )

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF \_\_\_\_\_ )

THE KNOWN AND UNKNOWN HEIRS,  
SUCCESSORS AND ASSIGNS OF )

\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, )

\_\_\_\_\_, \_\_\_\_\_ AND \_\_\_\_\_ )

### **REQUESTS FOR ADMISSIONS**

COMES NOW, \_\_\_\_\_, by and through its attorney of record makes the Requests for Admissions unto \_\_\_\_\_, as hereinafter set out, pursuant to and in accordance with Rules \_\_, and \_\_, of the \_\_\_\_\_ Rules of Civil Procedure, to wit:

1. In the absence of a court judgment to the contrary the admitting party shall have \_\_\_\_\_ (\_\_\_\_) days after service of this Request in which to admit or deny the Requests below, unless the Requests below are served upon the admitting party within \_\_\_\_\_ (\_\_\_\_) days after the date of being summoned, in which event the admitting party shall respond no later than \_\_\_\_\_ (\_\_\_\_) days after having been summoned.

2. If no response is made by the admitting party as is above set out, the matter is admitted.

3. If an objection is made, the reasons therefor shall be stated.

4. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party truthfully cannot admit or deny the matter. A denial shall fairly meet the substance of the requested admission and when good faith requires that a party qualify his answer or deny only a part of the matter of which an admission is requested, he shall specify so

much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless he states that he has made reasonable inquiry and that the information known or readily obtainable by him is insufficient to enable him to admit or deny. A party who considers that a matter of which an admission has been requested presents a genuine issue for trial may not, on that ground alone, object to the request; he may, subject to Rule \_\_, \_\_\_\_\_, deny the matter or set forth reasons why he cannot admit or deny it.

5. If a party fails to admit the genuineness of any document or the truth of any matter as requested under Rule \_\_ \_\_\_\_\_, and if the party requesting the admissions thereafter proves the genuineness of the document or the truth of the matter, he may apply to the court for an order requiring the other party to pay him the reasonable expenses incurred in making the proof, including reasonable attorney's fees.

REQUEST NUMBER ONE: Admit that the Last Will and Testament of Mrs. \_\_\_\_\_ has not been probated.

REQUEST NUMBER TWO: Admit that the whereabouts of the Last Will and Testament of Mrs. \_\_\_\_\_ is unknown.

REQUEST NUMBER THREE: Admit that the Last Will and Testament of \_\_\_\_\_ has not been probated.

REQUEST NUMBER FOUR: Admit that the whereabouts of the Last Will and Testament of \_\_\_\_\_ is unknown.

REQUEST NUMBER FIVE: Admit ouster resulted in the 1950's.

REQUEST NUMBER SIX: Admit ouster as against your contended predecessors in title resulted in the 1950's.

REQUEST NUMBER SEVEN: Admit ouster resulted in the 1960's.

REQUEST NUMBER EIGHT: Admit ouster as against your contended predecessors in title resulted in the 1960's.

REQUEST NUMBER NINE: Admit ouster resulted in the 1970's.

REQUEST NUMBER TEN: Admit ouster as against your contended predecessors in title resulted in the 1970's.

REQUEST NUMBER ELEVEN: Admit ouster resulted in the 1980's.

REQUEST NUMBER TWELVE: Admit ouster as against your contended predecessors in title resulted in the 1980's.

REQUEST NUMBER THIRTEEN: Admit ouster has resulted in the 1990's.

REQUEST NUMBER FOURTEEN: Admit ouster as against your contended predecessors in title has resulted in the 1990's.

Respectfully Submitted,

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