

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

_____)	
)	
)	
Petitioner/Plaintiff,)	
)	
Vs.)	NO. _____
)	
_____)	
Respondent/Defendant)	
)	

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

The Plaintiff, _____, propounds this his First Set of Requests for Admissions pursuant to Rule ___ of the _____ 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 herein means the occurrence described in the complaint.

REQUESTS FOR ADMISSIONS

Request No. 1: That Defendant was the operator of the Chevrolet automobile that collided with the rear of Plaintiff's automobile on the ____ day of _____, 20__.

Request No. 2: That Defendant was the owner of the Chevrolet automobile that collided with the rear of Plaintiff's automobile on the ____ day of _____, 20__.

Request No. 3: That on the ____ day of _____, 20__, Defendant drove his automobile into the rear of Plaintiff's automobile.

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

Request No. 5: That the front of the Defendant's automobile collided with the rear of the Plaintiff's 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 automobile into the rear of Plaintiff's automobile.

Request No. 8: That at the time of the accident failed to have his 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 _____ of the _____ Code Annotated.

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 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 Highway ____ and _____ Road.

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 automobile into the rear of Plaintiff's automobile.

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

Request No. 18: That Defendant proximately contributed to the accident.

Respectfully submitted,

Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed, U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to _____, at the following address;

THIS the ____ day of _____, 20____.