IN THE	COURT OF STATE OF	COUNTY
	STATE OF	
Petition))) ner/Plaintiff,	
Vs.)	NO
Responder	nt/Defendant)	
	SET OF REQUESTS FOI INDED BY PLAINTIFF	
The Plaintiff	propound	s 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 truthful	lness of said requests within
() days of service hereof.		
	DEFINITIONS	
The term "accident",	as used occurrence describ	ped in the complaint herein means the
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	REQUESTS FOR ADMIS	SSIONS
Request No. 1: The	at Defendant was the op	perator of the
automobile that collided w	ith the rear of Plaintiff	's automobile on the day of
, 20		

Request No. 2: That Defendant was the owner of the
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 into the rear of Plaintiff's his automobile.
Request No. 4: That Defendant drove his 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
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

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.

		Respectfully submitted,
Dated:		
	Name:	
	Title:	
	Address:	
	Address:	
	City, State, Zip:	
	Phone:	
	Fax:	
	E-Mail:	
	Attorney No.:	

CERTIFICATE OF SERVICE

I,, do hereby certify tha							at I have this day mai							
U.S.	Mail,	postage	prepaid,	a	true	and	correct	copy	of	the	above	and	foregoing	to
						,	at		the		follov	ving	addre	3 SS
	THIS	S the	_ day of				_, 20	_•					-	