

IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

PATRICK C. DESMOND AND MARY)
C. DESMOND, INDIVIDUALLY, AND)
MARY C. DESMOND, AS)
ADMINISTRATRIX OF THE ESTATE)
OF PATRICK W. DESMOND,)

Plaintiffs,)

v.)

NARCONON OF GEORGIA, INC.)
DELGADO DEVELOPMENT, INC.,)
SOVEREIGN PLACE, LLC, SOVEREIGN)
PLACE APARTMENT MANAGEMENT,)
INC., LISA CAROLINA ROBBINS, M.D.)
THE ROBBINS GROUP, INC., and)
NARCONON INTERNATIONAL,)

Defendants.)

Civil Action No. 10A 28641-2

**PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO
DEFENDANT DELGADO DEVELOPMENT, INC.**

TO: DELGADO DEVELOPMENT, INC.

Pursuant to O.C.G.A. § 9-11-36 you are hereby required to Answer, in the form provided
by law, the following Requests for Admissions:

1.

Admit that you knew that One Sovereign Place Apartments housed drug and alcohol
rehabilitation patients of Narconon of Georgia on June 10, 2008.

This the 16th day of May, 2010.

HARRIS PENN & LOWRY, LLP



JEFFREY R. HARRIS

Georgia Bar No: 330315

DARREN W. PENN

Georgia Bar No. 571322

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that I have this day submitted **PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO DEFENDANT DELGADO DEVELOPMENT, INC.** to a representative of Dial Services, to serve them along with a Summons and Complaint.

This the 18th day of May, 2010.

HARRIS PENN & LOWRY, LLP



JED D. MANTON
Ga. Bar No. 868587
JEFFREY R. HARRIS
Georgia Bar No: 330315