

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,)

Civil Action No. 10A 28641-2

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.)

**PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO
DEFENDANT SOVEREIGN PLACE APARTMENT MANAGEMENT, INC.**

TO: SOVEREIGN PLACE APARTMENT MANAGEMENT, 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 17 day of May, 2010.

HARRIS PENN & LOWRY, LLP



JEFFREY R. HARRIS

Georgia Bar No: 330315

DARREN W. PENN

Georgia Bar No. 571322

STEPHEN G. LOWRY

Georgia Bar No: 460289

PAUL W. PAINTER, III

Georgia Bar No. 520965

JED D. MANTON

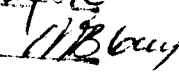
Georgia Bar No. 868587

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Attorneys for Plaintiff

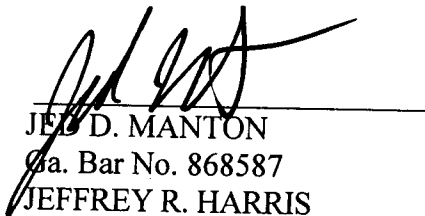
FILED IN THIS OFFICE
THIS 19 DAY OF May 2010

Clerk, State Court, DeKalb County

CERTIFICATE OF SERVICE

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

This the 16th day of May, 2010.

HARRIS PENN & LOWRY, LLP



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