

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, LLC

TO: SOVEREIGN PLACE, LLC


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 10th day of May, 2010.

HARRIS PENN & LOWRY, LLP



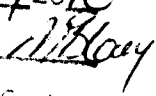
JEFFREY R. HARRIS
Georgia Bar No: 330315
DARREN W. PENN
Georgia Bar No. 571322
STEPHEN G. LOWRY
Georgia Bar No: 460289
PAUL W. PAINTER, III
Georgia Bar No. 520965
JED D. MANTON
Georgia Bar No. 868587

HARRIS PENN & LOWRY, LLP
817 W. Peachtree St.
Suite 1105
Atlanta, GA 30308
Telephone: (404) 961-7650
Facsimile: (404) 961-7651

REBECCA FRANKLIN
Georgia Bar No. 141350

FRANKLIN LAW, LLC
Midtown Proscenium Center
1170 Peachtree Street
Suite 1200
Atlanta, GA 30309
Telephone: (404) 961-5333
Facsimile: (404) 969-4503

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, LLC** to a representative of Dial Services, to serve them along with a Summons and Complaint.

This the 10th day of May, 2010.

HARRIS PENN & LOWRY, LLP



JEFFREY R. HARRIS
Ga. Bar No. 868587
JEFFREY R. HARRIS
Ga. Bar No: 330315