

IN THE SIXTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

JANE DOE, )  
)  
Plaintiff, )  
)  
vs. ) No. \_\_\_\_\_  
)  
JOHN DOE, )  
)  
Defendant. )

**PLAINTIFFS' MOTION TO RELY UPON  
REQUESTS FOR ADMISSION**

The plaintiffs have served two sets of Requests to Admit upon the defendants to which the defendants chose not to respond. Because the time for response set forth in Rule 36 of the Tennessee Rules of Civil Procedure has passed, the plaintiffs hereby move this court to take notice that the facts admitted in the two sets of Requests to Admit are conclusively established.

Filed contemporaneously herewith is a memorandum of law setting forth in detail why the plaintiffs are entitled to rely upon the unanswered requests for admissions. The plaintiffs also submit the following materials in support of this motion:

1. Plaintiffs' First Requests to Admit, served January 29, 2001;
2. Notice of Intent to Rely on Requests to Admit, served March 7, 2001; and
2. Plaintiff's Second Requests to Admit, served December 3, 2001.

Respectfully submitted,

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Rebecca C. Blair, No. 17939  
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(615) 742-4880

Counsel for Jane Doe

**NOTICE OF HEARING**

**THIS MATTER IS EXPECTED TO BE HEARD ON \_\_\_\_\_,  
2002 AT 9:30 A.M. AT THE BEGINNING OF THE REGULAR MOTION  
DOCKET OR AS SOON THEREAFTER AS COUNSEL MAY BE HEARD. IF  
NO RESPONSE IS TIMELY FILED AND SERVED, THE MOTION SHALL BE  
GRANTED.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been forwarded via U. S. Mail,  
first-class, proper postage prepaid to counsel for Defendants, on this the \_\_\_\_\_ day of  
\_\_\_\_\_, 20\_\_\_\_.