

DISCOVERY BY MOVANT TO DEBTOR

Interrogatory #1: Name all witnesses you intend to call at the hearing. Designate which are expert witnesses. Provide a brief statement of the substance of the testimony of the witness. Provide a copy of any written expression of opinion as to value of any property for which the stay is sought to be lifted.

Interrogatory #2: State the amount of equity, if any, in the subject property.

Interrogatory #3: State all reasons why this property is necessary for an effective reorganization.

Requests for Admissions: Debtor admits to the truth of the following matters of fact:

Request for Admission #1: A true and correct copy of that certain promissory note (hereinafter referred to as the “_____Note”), dated_____, in the original principal amount of \$_____, made by debtor and payable to the order of movant, is attached hereto as Exhibit A.

Request for Admission #2: The signature of debtor which appears on the _____ Note is genuine.

Request for Admission #3: On or about _____, debtor signed the _____ Note to movant.

Request for Admission #4: On or about _____, debtor delivered the _____ Note to movant.

Request for Admission #5: The _____ (title of security document), a true and correct copy of which is attached hereto as Exhibit B, was executed by the debtor on the date indicated.