

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.

Request 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 _____ Dollars (\$____), 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.