

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

THOMAS NEELY, )  
 )  
Plaintiff, )  
 )  
v. ) No. 3:05-CV-304  
 ) (Guyton)  
FOX OF OAK RIDGE, INC. and )  
BENJAMIN H. CURD, )  
 )  
Defendant. )

(SAMPLE) DEFENDANT, FOX OF OAK RIDGE, INC.'S RESPONSE TO  
PLAINTIFF'S REQUESTS FOR ADMISSIONS

8. On July 12, 2004 a vehicle accident occurred involving Plaintiff, Thomas Neely and Defendant, Benjamin Curd.

RESPONSE: ADMIT

9. On July 12, 2004, Defendant Benjamin Curd was an employee of Fox of Oak Ridge, Inc.

RESPONSE: ADMIT

10. Fox of Oak Ridge, Inc.'s job description for Defendant Benjamin Curd at that time "Driver/Porter."

RESPONSE: ADMIT

11. Defendant Benjamin Curd was driving a 1998 Chevrolet Van when the accident occurred.

RESPONSE: ADMIT

12. On July 12, 2004, when the accident occurred, Fox of Oak Ridge, Inc. was the registered owner of the 1998 Chevrolet Van involved in the accident.

RESPONSE: ADMIT

13. On July 12, 2004, Defendant, Benjamin Curd picked up the 1998 Chevrolet Van involved in the accident from a repair shop to return it to Fox of Oak Ridge, Inc..

RESPONSE: ADMIT