

**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.