

SAMPLE CIVIL FORM 61A

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ COUNTY

A.B., Plaintiff )  
v. )  
C.D., Defendant )

CIVIL ACTION NO. \_\_\_\_\_

**MOTION FOR ORDER THAT  
FACTS BE TAKEN AS ESTABLISHED**

Plaintiff shows the courts as follows:

1. On *(date)*\_\_\_\_\_, plaintiff served on defendant a request for admission of the following facts:

(a) \_\_\_\_\_

(b) \_\_\_\_\_

*[A copy of the request is attached as Exhibit A]*

2. On *(date)*\_\_\_\_\_, the Plaintiff moved for determination of the sufficiency of Defendant's answers of *(date)*\_\_\_\_\_, and on *(date)*\_\_\_\_\_, this court entered an order requiring Defendant to amend his answers of *(date)*\_\_\_\_\_ .

3. On *(date)*\_\_\_\_\_, the Defendant served on Plaintiff his amended answers, [a copy of which is attached as Exhibit B]. Said amended answer also contains no specific denial of the matters of which an admission was requested of the Defendant nor does it set forth the reasons why Defendant cannot truthfully admit or deny these matters.

Wherefore, Plaintiff moves the Court for an order establishing as admitted the said facts set forth in Paragraph 1 above.

\_\_\_\_\_  
Attorney for Plaintiff

\_\_\_\_\_  
Address

## **Committee Comments**

Bracketed material is optional, in lieu of setting forth the pertinent requests.