

VIRGINIA:

IN THE CIRCUIT COURT FOR FAUQUIER COUNTY

WAT LAO BUDDHAVONG, INC.,)
)
 Plaintiff,) Case No. CL20-122
)
 v.)
)
 SOUKSOMBOUN SAYASITHSENA, ET AL.)
)
 Defendants.)

MOTION TO STRIKE
FIRST SET OF ADMISSIONS FOR PRODUCTION TO PLAINTIFF

COMES NOW your Plaintiff, WAT LAO BUDDHAVONG, INC. ("Wat Lao"), through counsel, and moves the Court to strike a document titled "Defendant Souksomboun Sayasithsena's First Set of Admissions for Production to Plaintiff Wat Lao Buddhavong, Inc.," and for other relief as set forth below.

1. The document is directed to a defendant named "Cenk Sidar," a person or organization who is not a party to the present case. The document defines "you" and "your" to mean "Cenk Sidar." The Instructions to the Requests are directed to "you" ["Cenk Sidar"] and to "Defendant." The specific requests contain the following further instruction: "You ["Cenk Sidar"] are requested to admit or deny the truth of the following matters of fact:"

2. Even the title of the document is confusing: "Defendant Souksomboun Sayasithsena's First Set of Admissions for Production to Plaintiff Wat Lao Buddhavong, Inc." The document appears to be intended as a request for admissions of certain facts. But given the seriousness of admissions and their potential consequences, it would be unjust for Plaintiff to be expected to respond to this document in its present form.

3. For these reasons, Plaintiff objects to filing any response to the document other than the present motion.

WHEREFORE, in light of the foregoing, Plaintiff respectfully moves this honorable Court to strike the "First Set of Admissions for Production to Plaintiff" served on Plaintiff by Defendant Souksomboun Sayasithsena; enter an order relieving Plaintiff of any obligation to respond to said document in its present form; and grant Plaintiff such further general relief as the Court deems just.

Respectfully submitted,
WAT LAO BUDDHAVONG, INC.

By counsel:




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CERTIFICATE OF SERVICE

I certify that on this 20th day of May, 2020, a copy of the foregoing was served via electronic mail and facsimile to:

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