#### VIRGINIA:

## IN THE CIRCUIT COURT FOR FAUQUIER COUNTY

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

# PLAINTIFF'S RESPONSE TO DEFENDANT'S REQUESTS FOR ADMISSION

COMES NOW your Plaintiff, WAT LAO BUDDHAVONG, INC. ("Wat Lao"), through counsel, and files the following response to the requests for admission ("Requests") propounded by Defendant Souksomboun Sayasithsena.

## **REQUESTS:**

- 1. Admitted.
- 2. Admitted.
- 3. Denied.
- 4. Denied.
- 5. Admitted.
- 6. Denied.
- 7. Denied.
- 8. Admitted.
- 9. Admitted.
- 10. Admitted.

- 11. Denied that former directors of Wat Lao "received" donations as compensation or for their own personal use; admitted that former directors may have physically handled donations as a logistical matter of processing donations.
- 12. Denied that current directors of Wat Lao have "received" donations as compensation or for their own personal use; admitted that current directors may have physically handled donations as a logistical matter of processing donations.
  - 13. Denied.
  - 14. Denied.
  - 15. Denied.
  - 16. Denied.
  - 17. Denied.
  - 18. Denied.
  - 19. Denied.
  - 20. Denied.

Respectfully submitted,

WAT LAO BUDDHAVONG, INC.

By counsel:

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### **CERTIFICATE OF SERVICE**

I certify that on this 9th day of June, 2020, a copy of the foregoing was served via electronic mail, by agreement, to:

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August McCarthy