## IN THE CIRCUIT COURT OF RUSSELL COUNTY, ALABAMA

TONYA CHERYL MOSES,

-VS-

Plaintiff,

**CIVIL ACTION NO. CV-05-447** 

ALLSTATE INDEMNITY COMPANY, EDDIE WATTS, DEXTER WALDEN,

**Defendant** 

## PLAINTIFF'S REPSONSE TO DEFENDANT, ALLSTATE INSURANCE **COMPANY'S REQUEST FOR ADMISSION**

That you will never seek or attempt to recover from Allstate Insurance Company 1. monetary damages in this case in excess of SEVENTY-FIVE THOUSAND and NO/100 (\$75,000.00) exclusive of interest and costs.

**RESPONSE: DENIED** 

Christina D. Crow

Attorney for the Plaintiff

## OF COUNSEL:

Jinks, Daniel & Crow, P.C. Post Office Box 350 Union Springs, Alabama 36089 Telephone: (334)738-4225

Fax: (334)738-4229

Joseph G Stewart, Esq. Post Office Box 911 Montgomery Alabama 36101-0911



## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon the following by placing a copy of the same in the United States mail, postage prepaid and 

> Thomas E. Bazemore, III, Esq. Gordon J. Brady, III, Esq. Huie, Fernambucq & Strewart, LLP The Protective Center 2801 Highway 280 South, Suite 200 Birmingham, Alabama 35223