

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

MICHELLE TALIAFERRO,)
MARIETTA TALIAFERRO and)
KEITH TALIAFERRO,)

Plaintiffs,)

v.)

Case No. 02CV233442

Division 16

GREEN VALLEY TRANSPORTATION)
CORP., CAROL L. KLAUDT, and)
MISSOURI HIGHWAY &)
TRANSPORTATION COMMISSION,)

Defendants.)

**PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO
DEFENDANT GREEN VALLEY TRANSPORTATION CORP.**

Plaintiff propounds the following requests for admissions to defendant Green Valley Transportation Corp. pursuant to Rule 59.01 of the Missouri Rules of Civil Procedure to be responded to within thirty (30) days from the date of service.

1. Admit that Green Valley Transportation Corp. was aware that Carol Klaudt was taking Paxil at the time she was hired by Green Valley.
2. Admit that Green Valley Transportation Corp. was aware that Carol Klaudt was taking Desryl at the time she was hired by Green Valley.
3. Admit that Green Valley Transportation Corp. was aware that Carol Klaudt had a history of depression at the time she was hired.
4. Admit that Green Valley Transportation Corp. was aware that Carol Klaudt had a history of alcoholism at the time she was hired by Green Valley.
5. Admit that Chris Taliaferro had a legal right to drive a tractor on Highway 50 in the right hand lane on September 11, 2002.

6. Admit that Highway 50 does not have a minimum speed limit.
7. Admit that Carol Klaudt was discharged from the Independence Regional Health Center at 5:10 p.m. on September 11, 2002
8. Admit that when Carol Klaudt was discharged from Independence Regional Health Center she was ambulatory.
9. Admit that Christopher Taliaferro's funeral bill from Becker-Dyer-Stanton Funeral Homes, Inc. was \$9089.42.
10. Admit that Carol Klaudt's cell phone number on September 11, 2002 was (209) 321-3585.
11. Admit that the semi-truck owned by defendant Green Valley and driven by defendant Carol Klaudt collided with the rear of Christopher Taliaferro's vehicle on September 11, 2002.
12. Admit that Kim Allen Klaudt was not a driver trainer for Green Valley Transportation Corp..
13. Admit that Green Valley Transportation Corp. did not have a position called "driver trainer" on September 11, 2002.
14. Admit that no employee of Green Valley Transportation Corp. contacted Independence Regional Health Center on September 11, 2002 to request that an alcohol test be administered to Carol Klaudt.

HENNING & BOUGH, P.C.

By _____
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ATTORNEYS FOR PLAINTIFF

Signature of this document certifies that it was served to the persons named below on the date and in the manner indicated:

Person Served	Party	Date	Method
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