

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
(BEAUMONT DIVISION)**

JAMIE LEIGH JONES and JOSEPH DAIGLE §
§

Plaintiffs, §

vs. §

CIVIL ACTION NO. 1:07CV0295

HALLIBURTON COMPANY d/b/a §
KBR KELLOGG BROWN & ROOT §
(KBR); KELLOGG BROWN & ROOT §
SERVICES, INC.; KELLOGG §
BROWN & ROOT INTERNATIONAL, §
INC.; KELLOGG BROWN & ROOT, §
LLC; KELLOGG BROWN & ROOT, §
INC.; KELLOGG BROWN & ROOT, §
S. de R.L.; KELLOGG BROWN & §
ROOT (KBR), INC.; KBR §
TECHNICAL SERVICES, INC.; §
OVERSEAS ADMINISTRATIVE §
SERVICES, LTD.; ERIC ILER, §
CHARLES BOARTZ; SEVERAL §
JOHN DOE RAPISTS, and THE §
UNITED STATES OF AMERICA §
Defendants. §

JURY TRIAL DEMANDED

MOTION TO DEEM ADMISSIONS

NOW COME, Jamie Leigh Jones and Joseph Daigle, and requests that certain Admissions be deemed by KBR Kellogg Brown & Root (KBR), Kellogg Brown & Root Services, for their failure to answer same in a timely manner as required by federal law.

On June 5, 2007, Plaintiffs Filed and Served 88 Requests for Admission on KBR, and informed Defendant that responses were due within 30 days of service.

Today, July 9th, 2007, is the 34th day after the Requests for Admission were served on the Defendant – and no Answers have been served on Plaintiff by Defendant.

No order staying discovery has ever been entered, or requested - in this forum.

Because the proceedings in this matter have not been stayed, and because the Defendant has failed to timely answer requests for admission, they have been deemed admitted in accordance with Federal Rule of Civil Procedure 36(a). Plaintiffs therefore respectfully request that this Honorable Court deem the following requested admissions admitted for purposes of this matter in this forum: Requests Numbered 1-7; 9; 11; 13; 15 - 23; 25 – 88.

Respectfully submitted,

/s/ L. Todd Kelly

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ATTORNEYS FOR CLAIMANT

CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record were served with true and correct copies of the attached First Requests for Admission on this 9th day of July, 2007:

Shadow Sloan, Esq.
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/s/ L. Todd Kelly

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ORDER DEEMING REQUESTS FOR ADMISSION - ADMITTED

THIS DAY CAME THE PARTIES, by Counsel, on *Plaintiff's Motion to Deem Admissions*. This Court, having considered the Motions filed by the parties, the evidence of record, and the arguments of Counsel is of the opinion that the *Plaintiff's Motion to Deem Admissions* is meritorious, and should be granted. It is, therefore,

ORDERED, ADJUDGED and DECREED that *Plaintiff's Motion to Deem Admissions* is, in all things, GRANTED.

IT IS SO ORDERED.

JUDGE