

IN THE CIRCUIT COURT OF HARDIN COUNTY, TENNESSEE  
AT SAVANNAH

CLARK JONES,

Plaintiff

v.

TONY HAYS, et al.

Defendants.

No. 3414

Jury Demanded

FILED 17th DAY OF Aug 2004 AT 10:45 AM PM  
DIANE POLK, CLERK  
BY: [Signature] CLERK

REQUEST OF WORLD NET DAILY.COM/HAGELIN  
FOR JONES TO ADMIT

**COME NOW** defendants, WORLD NET DAILY.COM (hereinafter "**WND**") and REBECCA HAGELIN (hereinafter "**Hagelin**") and propound to plaintiff, CLARK JONES (hereinafter "**Jones**"), pursuant to *Tennessee Rules of Civil Procedure*, Rule 36.01, the following requests to admit:

**REQUEST NO. 1:** Jones contributed money to Community Partners.

**REQUEST NO. 2:** Jones showed support for the efforts of Community Partners.

**REQUEST NO. 3:** Community Partners was a grassroots citizens group formed for the stated purpose of combating drug trafficking and use in Hardin County, Tennessee.

**REQUEST NO. 4:** Community Partners, as one of its purposes, attempted to bring public attention to and generate public pressure on law enforcement officials to aggressively enforce what Community Partners represented to be a drug problem in Hardin County.

**REQUEST NO. 5:** Community Partners, by design, received publicity in Hardin County by news circulating publications.

**REQUEST NO. 6:** Community Partners, by design, engaged in efforts such as public meetings to talk about efforts of Community Partners to bring attention to what Community Partners stated to be the drug problem in Hardin County, Tennessee and to influence public officials to address the problem.

**REQUEST NO. 7:** For years prior to 2000 and in 2000, though contended by Jones to have no basis in fact, Jones had a reputation circulated among some persons in Hardin County, Tennessee that portrayed Jones as a person involved in illicit drugs in Hardin County, Tennessee.

Respectfully submitted,

LARRY E. PARRISH, P.C.

By:

A handwritten signature in black ink, appearing to read 'L. Parrish', written over a horizontal line.

Larry E. Parrish

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **REQUEST OF WORLD NET DAILY.COM/HAGELIN FOR JONES TO ADMIT** document has been sent via U. S. Mail to

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on this the 10<sup>th</sup> day of August 2004.

  
Larry E. Parrish