

the Plaintiff.

7. Do you have custody and control of books of account reflecting the partnership's business transactions?

8. Do you have custody and control of books of account reflecting business transactions of the Plaintiff?

9. Did you loan a partnership between you and the Plaintiff for the purpose of construction of residential dwellings for resale any monies?

10. Do you contend that you contributed monies towards the partnership with the Plaintiff for the construction of dwellings for resale on lots 1, section 3 and lots 3 and 18, section 2?

11. If the Answer to No. 10 is yes, state dates and amounts of contributions.

12. Did you and the Plaintiff file partnership returns for the years 1975 to and including the year 1978?

13. If Answer to No. 11 is yes, attach a copy of said partnership returns.

14. Did you earn personal income for the last five years?

15. If Answer to No. 13 is yes, attach copies of personal income tax returns for the last five years.

16. Do you contend you advanced a partnership between you and the Plaintiff and monies?

17. If so, state when and how much and repayment terms.

18. Do you contend that you contributed any capital to either the Plaintiff or a partnership described hereto to purchase lot 18, section 2, lot 3, section 2 and lot 1, section 3 of Deer Spring Farms, Inc., recorded in Plat Book 7, Folio 61?

19. If so, state amounts of capital, dates and to whom paid.

20. Do you have evidence showing such contribution was made and if so, attach a copy of said evidence.

21. Do you contend the Plaintiff is indebted to you in sums in connection with the real estate that is the subject of the Bill for Partition and Sale of Real Estate and if so, state the facts upon which you rely.

22. Do you contend the Plaintiff is indebted to you in sums in connection with the real estate that is the subject of the Bill for Partition and Sale of Real Estate and if so, state the amount of indebtedness.

23. Do you contend the alleged partnership is indebted to third persons