

IN THE CIRCUIT COURT OF THE
9TH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA

TEXAS EQUUSEARCH MOUNTED
SEARCH AND RECOVERY, a Texas
Non-Profit Corporation,

GENERAL JURISDICTION DIVISION

CASE NO.: 11-CA-8475

Plaintiff,

v.

CASEY ANTHONY,

Defendant.

PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANT

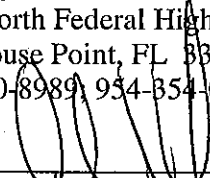
Plaintiff Texas EquuSearch Mounted Search and Recovery, (hereinafter "Plaintiff" or "EquuSearch"), pursuant to Rule 1.370, Florida Rules of Civil Procedure, requests Defendant Casey Anthony (hereinafter "Defendant"), to admit, in this action, that each of the following statements is true:

1. Admit that your daughter, Caylee Marie Anthony, died on June 16, 2008.
2. Admit that your daughter, Caylee Marie Anthony, drowned in the swimming pool at your parents' house on June 16, 2008.
3. Admit that George Anthony learned on June 16, 2008, that your daughter Caylee Marie Anthony drowned in the swimming pool at your parents' house on June 16, 2008.
4. Admit that you did not call 911 at any time to report that you had discovered that Caylee Marie Anthony had drowned in the swimming pool at your parents' house on June 16, 2008.

5. Admit that you did not observe or hear George Anthony call 911 at any time to report that he or you had discovered that Caylee Marie Anthony had drowned in the swimming pool at your parents' house on or about June 16, 2008.
6. Admit that you met with Tim Miller of EquuSearch at your parents' house in August 2008.
7. Admit that your parents, Cindy and George Anthony were present when you met with Tim Miller of EquuSearch at your parents' house on August 2008.
8. Admit that all statements made by Attorney Jose Baez in his opening statement in your criminal trial are true.
9. Admit that you told Tim Miller of Texas EquuSearch in August 2008 that you believed that Caylee Marie Anthony was alive.
10. Admit that you told Tim Miller of Texas EquuSearch in September 2008 that you believed that Caylee Marie Anthony was alive.
11. Admit that you told Tim Miller of Texas EquuSearch in October 2008 that you believed that Caylee Marie Anthony was alive.
12. Admit that you told Tim Miller of Texas EquuSearch in November 2008 that you believed that Caylee Marie Anthony was alive.
13. Admit that you did not tell Tim Miller of EquuSearch at any time prior to December 11, 2008, that Caylee Marie Anthony was deceased.
14. Admit that you did not tell Tim Miller of EquuSearch at any time prior to December 11, 2008, that Caylee Marie Anthony was not missing.
15. Admit that you were aware in September 2008 and October 2008 that EquuSearch was conducting searches for your daughter, Caylee.

Respectfully Submitted,

WITES & KAPETAN, P.A.
Attorneys for Plaintiff
4400 North Federal Highway
Lighthouse Point, FL 33064
954-570-8989; 954-354-0205 (fax)

By: 

MARC A. WITES
Florida Bar No. 24783
ALEX N. KAPETAN, JR.
Fla. Bar No.: 181234
JONATHAN S. BURNS
Florida Bar No. 0027555

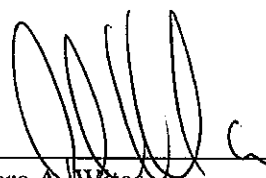
CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was served via facsimile and first class mail this 19th day of July, 2011, upon:

Charles M. Greene
Law Offices of Charles M. Greene, P.A.
28 E. Washington Street
Orlando, FL 32801
Fax : 407-648-0071

Jose Baez
The Baez Law Firm
522 Simpson Road
Kissimmee, FL 34744
Fax: 407-705-2625

James Cheney Mason
390 North Orange Avenue
Suite 2100
Orlando, FL 32801



Marc A. Wites

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Plaintiff,

v.

CASEY ANTHONY,

Defendant.

**NOTICE OF SERVICE OF PLAINTIFF'S
FIRST SET OF INTERROGATORIES TO DEFENDANT**

Plaintiff Texas EquuSearch Mounted Search and Recovery, (hereinafter "Plaintiff" or "EquuSearch") propounds the attached set of interrogatories upon Defendant Casey Anthony. These Interrogatories must be answered fully and separately in writing, under oath, within 30 days, in accordance with the applicable Florida Rules of Civil Procedure. The answers shall be provided to the law firm of Wites & Kapetan, P.A., 4400 N. Federal Highway, Lighthouse Point, Florida 33064.

Respectfully Submitted,

WITES & KAPETAN, P.A.
Attorneys for Plaintiff
4400 North Federal Highway
Lighthouse Point, FL 33064
954-570-8989; 954-354-0205 (fax)

By: _____

MARC A. WITES
Florida Bar No. 24783
ALEX N. KAPETAN, JR.
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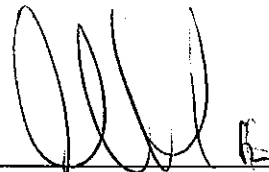
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Orlando, FL 32801



Marc A. Wites

INTERROGATORIES

1. State the name, address and telephone number of each and every person who knew before, December 11, 2008, that Caylee Marie Anthony was deceased, and for each such person state the basis for your knowledge that each identified person knew that Caylee was deceased.

ANSWER:

2. With regard to the Opening Statement of your attorney, José Baez, a copy of the transcript which is attached hereto as Exhibit A, please identify every statement by Mr. Baez which was false and, with regard to every such statement:

- a. State why the statement is false;
- b. Identify every person who has knowledge about the falsity of the statement by name, address, telephone number, and the subject matter of their knowledge; and
- c. identify any and all documents which support your contention that the statement is false.

ANSWER:

3. Identify every person whom you told prior to May 24, 2011, that Caylee Marie Anthony died on June 16, 2008, and for each such person state:

- a. Their name, address, and telephone number;
- b. The date when you told them;
- c. Whether you told them in person, over the telephone, in writing or otherwise;
- d. What you told them about Caylee's death; and
- e. Identify all other person(s) who were present during this communication.

ANSWER:

4. Identify every person who was present at your parents' home at each time that Tim Miller was visiting your parents' home, and for each such person state their name, address, and telephone number.

ANSWER:

5. State the name, address and telephone number of the biological father of your daughter, Caylee Marie Anthony.

ANSWER:

6. For each Request for Admission in the accompanying Plaintiff's Requests for Admission for which you did not provide an unqualified admission, please state the basis for your response, identifying each person who has knowledge of any of the facts on which you based your response and identifying every document which supports your response.

ANSWER:

