

IN THE SUPERIOR COURT OF MUSCOGEE COUNTY
STATE OF GEORGIA

GREGORY D. COUNTRYMAN, SR.,)
individually and as Elected Marshal of)
Muscogee County, Georgia and,)
VIVIAN BISHOP, individually and as)
Elected Clerk of the Municipal Court of)
Columbus, Georgia,)

Plaintiffs,)

v.)

COLUMBUS, GEORGIA, TERESA P.)
TOMLINSON, individually and as Mayor,)
JERRY "POPS" BARNES, individually)
and as District 1 Councilor, GLENN)
DAVIS, individually and as District 2)
Councilor, BRUCE HUFF, individually)
and as District 3 Councilor, EVELYN)
TURNER PUGH, individually and as)
District 4 Councilor, MIKE BAKER,)
individually and as District 5 Councilor,)
GARY ALLEN, individually and as)
District 6 Councilor, EVELYN "MIMI")
WOODSON, individually and as)
District 7 Councilor, JUDY THOMAS,)
individually and as District 9 Councilor,)
and BERRY "SKIP" HENDERSON,)
individually and as District 10 Councilor,)
ISAIAH HUGLEY, individually and as)
City Manager, PAMELA HODGE,)
individually and as Finance Director, and)
CLIFTON C. FAY, individually and as)
City Attorney,)

Defendants.)

CIVIL ACTION FILE NO. SU14CV3468-94

DEFENDANTS' REQUESTS FOR ADMISSIONS

COME NOW DEFENDANTS in the above-styled action, and pursuant to O.C.G.A. §9-11-36 and the instruction of this Court, file this their Requests for Admissions to Plaintiffs to be answered no later than May 27, 2015.

REQUESTS FOR ADMISSIONS

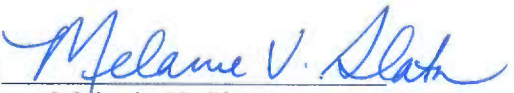
- 1) Admit that neither Plaintiff submitted to the City Manager, Mayor or Finance Director in Fiscal Year 2015 or Fiscal Year 2016 a plan of financial operation embodying an estimate of proposed expenditures during a budget period and the proposed means of financing them.
- 2) Admit that neither Plaintiff submitted budget requests to the City Manager in Fiscal Year 2015.
- 3) Admit that the chief executive of any Georgia county or consolidated city-county government, including the Mayor of Columbus, Georgia, may exercise an initial budget policy-making function.
- 4) Admit that the Mayor must propose expenditures detailed for each elected office in accordance with an established classification of accounts.
- 5) Admit that neither Plaintiff is a municipality, county, consolidated city-county government, or other political subdivision of the state.
- 6) Admit that neither Plaintiff was appointed by local law, charter, ordinance or resolution as the official charged with budget preparation and administration for the local government.
- 7) Admit that neither Plaintiff has submitted filings to the Georgia Department of Community Affairs as is required by law of a “unit of local government.”

- 8) Admit that the Columbus Council adopts the Columbus Consolidated Government budget ordinance for each fiscal year.
- 9) Admit that the Plaintiffs' Fiscal Year 2016 budget requests were submitted to Columbus Council.
- 10) Admit that any duties or powers of the Plaintiffs are limited in application to the Municipal Court of Columbus, Georgia.

Respectfully submitted this 13th day of May, 2015.

**HATCHER, STUBBS, LAND,
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **DEFENDANTS'**
REQUESTS FOR ADMISSIONS via electronic mail, per agreement of counsel and the
Court, addressed as follows:

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Judge Hilton M. Fuller
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This 13th day of May, 2015.


Attorney for Defendants