# IN THE TENNESSEE COURT OF THE JUDICIARY

#### IN RE: THE HONORABLE JAMES TAYLOR GENERAL SESSIONS COURT JUDGE **HAWKINS COUNTY, TENNESSEE**

FILED

APR 02 2012 Clerk of the Courts

### Docket No. <u>M2011-00706-CJ-CJ-CJ</u>

### **RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS**

COMES NOW the Hon. James Taylor, and files this Response and Objection to

the Requests for Admissions filed, and shows as follows:

## PRELIMINARY OBJECTIONS

The Formal Charges and Amended Complaint/Formal Charges filed against Judge Taylor alleges, among other things, acts that could be deemed in contradiction of Tenn. Code Ann. Title 39. Based upon these allegations, Judge Taylor has been advised by counsel to assert and invoke, and hereby does respectfully assert and invoke, his privilege against self-incrimination guaranteed by the Fifth Amendment of the United States Constitution and under Article I, Section 9 of the Tennessee Constitution, and therefore, Judge Taylor must respectfully decline to make further response at this time other than is contained herein this pleading.

#### **GENERAL OBJECTIONS**

A. Judge Taylor objects to the Requests to the extent they purport to impose obligations and require procedures beyond those set forth in the Tennessee Rules of Civil Procedure and all other applicable laws and rules.

**B.** Judge Taylor objects to the Requests to the extent they purport to require the disclosure of information that is not presently in the possession, custody or control of Judge Taylor.

C. Judge Taylor objects to the Requests to the extent they are overbroad, unduly burdensome and are not reasonably calculated to lead to the discovery of relevant information.

D. Judge Taylor's failure to object on any particular ground shall not be construed as a waiver of his right to object on any additional ground.

E. In making these objections, Judge Taylor does not in any way waive or intend to waive, but rather preserves and intends to preserve:

- 1. all rights to object on any ground to the competency, relevancy, materiality and admissibility of any information that may be provided in response to the Requests or the subject matter thereof;
- 2. all rights to object on any ground to the use of any information or document that may be provided in response to the Requests or subject matter thereof; and
- 3. all rights to object on any ground to any request for further responses to this or any other discovery request.

#### **REQUESTS 1-6**

Judge Taylor hereby invokes his privilege against self-incrimination and objects to Requests 1 through 6 on that ground.

This the <u></u>day of April 2012.

Hon. James F. Taylor General Sessions Court Judge Hawkins County, Tennessee PO BOX 157 Rogersville, TN 37857

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## **CERTIFICATE OF SERVICE**

I, James Taylor, hereby certify that J have served a true and exact copy of the foregoing, on the following individual(s), via United States mail, postage prepaid, addressed as follows:

Timothy Discenza The Tennessee Court of the Judiciary P.O. Box 50356 Nashville, TN 37205

THIS the <u>day of April 2012</u>