

11/11/2016

PLAINTIFF,

[illegible]

JUDGE [REDACTED]

PLAINTIFF

NOW COMES Plaintiff, [REDACTED]

When used in these interrogatories, the term "Defendant" or any synonym thereof is intended and

DEFINITIONS

1. Wherever relevant, words in the singular shall include the plural thereof. For example, “state the date” shall mean “state the states” when there is more than one date which is relevant to the answers to interrogatories.

2. “Identify” or “identification”, when referring to a natural person, shall mean to provide the following information:

- A. his or her full name;
- B. his or her present or last known address;

- C. the last date when such address was known or to believed to be correct;
 - D. his or her present or last known business affiliation, title, and occupation; and
 - E. each of his or her positions, titles, or job descriptions during the period of time covered by any answers referring to such person.
3. "Date" shall mean the exact day, month, and year, if ascertainable, or, if no, the best approximation thereof in relation to other events.
4. "You" and "your" as used herein shall refer to Defendant, any person acting on behalf of Defendant, including, but not limited to, his or her attorneys or other person acting on behalf of the attorney representing Defendant.
5. As used herein, the terms "person" and "persons" include natural persons, private corporations, governmental entities, partnerships, associations, and joint ventures.
6. All words in the masculine gender shall include the feminine gender thereof. For example, "his" shall include "her".

INSTRUCTIONS

1. These interrogatories are to be answered separately and fully by Defendant in accordance with the [REDACTED] Court Rules. If the defendant cannot answer the interrogatories in full, answer to the extent possible and explain the inability to fully answer the interrogatories.
2. Wherever the Defendant is requested to identify a series of person, oral communication, or objects and to provide for each item certain information relating thereto. The defendant shall arrange his answers to list the information for each item with that particular item in order that the answer designates the item to which the answer relates.
3. These interrogatories shall be deemed continuing, and supplemental responses shall be required if Defendant directly or indirectly obtains further information.
4. In answering these interrogatories, Defendant shall furnish all information available at the time of answering, including information obtainable by Defendant from Defendant's attorneys, investigators, agents, and representatives.

5. If you contend any information sought in this set of interrogatories is exempt from discovery because it falls within the attorney-client privilege, it was prepared in anticipation of litigation or in preparation for trial, or falls within any other privilege or protection, you are to provide the following information sought:
- a. the privilege or protection which you contend applies;
 - b. the form which the information is contained;
 - c. if the information is contained within a document, the person involved in and the date of the communication giving rise to the privilege or protection that you claim; and
 - d. the subject matter of the information that you contend is privilege or protected from discovery.

PLAINTIFF [REDACTED] FIRST SET OF INTERROGATORIES TO
DEFENDANT [REDACTED]

INTERROGATORY NO. 1: If you were insured at the time of the accident, please state the name and address of the insurance company which insured you, the policy number, the effective dates if the insurance policy, the limits, in dollars, of the coverage extended under said insurance policy, per person, per accident. If the applicability/coverage of said insurance policy to this lawsuit is being contested in any way by your insurer, please state the factual and legal grounds upon which applicability/coverage is being contested.

ANSWER:

INTERROGATORY NO. 2: Identify the owner/owners of the vehicle driven by Defendant [REDACTED]
[REDACTED]

ANSWER:

INTERROGATORY NO. 3: Please state whether or not any portion of your motor vehicle was damaged. If there was damage to your vehicle, please state what portions of your motor vehicle were damaged and whether the damage has been repaired and if so, state the date and place it was repaired and the total cost of repair.

ANSWER:

INTERROGATORY NO. 4: Please state the name and addresses of each and every witness, lay expert you intend to call at the time of trial and provide a detailed synopsis and/or summary of the nature or areas of each respective witness's testimony.

ANSWER:

INTERROGATORY NO. 5: Has Defendant [REDACTED] ever been convicted of any crime (including traffic offenses) in this state or elsewhere? If so, please state the nature of the offense, the date of the conviction and the sentence received.

ANSWER:

INTERROGATORY NO. 6: On the date of the subject motor vehicle accident, was the manner in which Defendant [REDACTED] driving impaired in any way, but not limited to: whether any drug,, medication, or alcoholic beverage was consumed during the 24-hour period immediately preceding the occurrence of the collision? If so, identify the nature and type of each.

ANSWER:

INTERROGATORY NO. 7: Was Defendant [REDACTED] at the time of the accident involved herein, or had he/she ever suffered from any physical or other disability or defect? If so, outline all disabilities and treatments received with the dates of treatment.

ANSWER:

INTERROGATORY NO. 8: Do you have, or know of the existence of, any photograph, or diagram relating to any matter concerning the accident? If so, identify by name and address who has custody.

ANSWER:

INTERROGATORY NO. 9: Have you ever been involved in a motor vehicle collision other than the collision identified in the complaint? If so, for each such motor vehicle collision, please state the date, place, insurance company, claim number, names of drivers and passengers involved in the collision.

ANSWER:

INTERROGATORY NO. 10: Have you discussed this incident on any social media websites, such as Facebook, Twitter, Instagram, etc.? If so, please state:

- a. The particular social media website and the URL for your account on that site;
- b. The dates and times you posted anything regarding this incident on any social media website.
- c. The particular persons or accounts with whom you had any particular discussion over social media regarding information you may have for those persons, including phone number, email address, and mailing address.

ANSWER:

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/s/ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Attorney for Plaintiff

DATED: [REDACTED]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically and duly served to the following party by operation of the Court's electronic filing system this [REDACTED] day of October [REDACTED]. Parties may access this filing through the Court's system.

[REDACTED]

Attorney for Defendant

/s/ [REDACTED]
[REDACTED]