

_____,
Plaintiff,

v.

_____,
Defendant.

Case No.: _____

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

PROPOUNDING PARTY: Plaintiff, _____

RESPONDING PARTY: Defendant, _____

SET NUMBER: One (1)

Pursuant to the applicable rules of civil procedure of this jurisdiction, Plaintiff hereby requests that Defendant answer the following interrogatories fully, in writing, and under oath, within the time prescribed by law, and that the answers be signed by the person making them and served upon the undersigned counsel for Plaintiff at the address set forth below.

DEFINITIONS

1. "You," "your," or "Defendant" refers to the responding party, _____, including its agents, representatives, employees, attorneys, investigators, and anyone acting on its behalf.
2. "Plaintiff" refers to _____, including any agents or representatives acting on Plaintiff's behalf.
3. "Document" or "documents" shall mean and include any and all written, recorded, graphic, or electronic matter, however produced or reproduced, now or formerly in your possession, custody, or control.
4. "Identify" when used in reference to a person means to state their full name, present or last known address, telephone number, and relationship to the parties in this action.

5. "Identify" when used in reference to a document means to state the date, author, recipient, general subject matter, and present location of the document.
6. "Incident" refers to the occurrence, transaction, or event described in Plaintiff's complaint, which forms the basis of this civil action.

INSTRUCTIONS

1. A complete and separate answer must be made to each interrogatory.
2. If you object to any interrogatory, state the specific grounds for the objection and answer the remaining portion of the interrogatory to the extent it is not objectionable.
3. If you cannot answer an interrogatory in full after exercising due diligence to secure the information, state the answer to the extent possible, specify the portion you cannot answer, and detail the efforts made to obtain the omitted information.
4. These interrogatories are continuing in nature, requiring you to file supplemental answers if you obtain further or different information before the time of trial.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each person who has personal knowledge of the facts surrounding the Incident, and for each person identified, state the general subject matter of their knowledge.

INTERROGATORY NO. 2:

Identify each person whom you expect to call as an expert witness at trial, and for each expert, state the subject matter on which they are expected to testify, the substance of the facts and opinions to which they are expected to testify, and a summary of the grounds for each opinion.

INTERROGATORY NO. 3:

State in detail your version of how the Incident occurred, including the date, time, precise location, and chronological sequence of events leading up to, during, and immediately following the Incident.

INTERROGATORY NO. 4:

If you contend that any other person or entity, including Plaintiff, caused or contributed to the Incident or the damages alleged in this action, state the facts upon which you base this contention.

INTERROGATORY NO. 5:

Identify all documents, communications, photographs, video recordings, or other tangible evidence

relevant to the Incident or the claims and defenses asserted in this action.

INTERROGATORY NO. 6:

State whether you were covered by any policy of insurance at the time of the Incident that may provide coverage or indemnification for the claims asserted in this action, and if so, state the name of the insurer, the policy number, and the limits of liability.

INTERROGATORY NO. 7:

Identify each statement, whether written, oral, or recorded, taken from Plaintiff or any witness regarding the Incident, and state the date the statement was taken, the name of the person who took the statement, and the name of the person who currently has custody of the statement.

INTERROGATORY NO. 8:

Describe in detail any and all repairs, inspections, or modifications performed on any property, vehicle, or equipment involved in the Incident for a period of one year prior to the Incident through the present date.

Dated: _____

Respectfully submitted,

Signature: _____

Printed Name: _____

Bar No.: _____

Address: _____

Phone: _____

Email: _____

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's First Set of Interrogatories to Defendant was served on this _____, via _____ to:

Recipient: _____

Address: _____

Email: _____

Signature: _____

Printed Name: _____