

_____ : _____ JUDICIAL DISTRICT COURT

VERSUS _____ : PARISH OF _____, LOUISIANA

_____ : DOCKET NO. _____

ANSWERS TO INTERROGATORIES

NOW INTO COURT, through undersigned counsel, comes _____
Plaintiff, who answers Defendant's, _____, interrogatories with respect shows:

1.

Name: _____
DOB: _____, _____
POB: _____, Louisiana
Marital St: _____
Address: _____, _____
SSN: _____

2.

I completed _____.

3.

I have never been convicted of any crimes whatsoever.

4.

I was traveling on _____ and my view was blocked by a cement truck traveling in my direction on my lane. The date of the accident was in the morning of _____, 20____ in _____, Louisiana.

5.

I have suffered severe neck pain as a result of the accident.

6.

I have not fully recovered from the injuries sustained.

7.

I still suffer a substantial amount of pain in my neck.

8.

I was admitted to _____ on _____, 20____ for injuries sustained from the accident. I am presently attending visits at _____, at _____, _____, LA ____.

9.

(11144) _____

_____, LA ____
Intermediate Care on _____, 20____ and _____, 20____
\$ ____

(2)

_____, LA ____
Radiology Services on _____, 20____ and _____, 20____.
\$ ____

_____, LA ____
Therapy, _____, 20____ through present.
\$ ____

10.

See Number 9 above.

11.

I am presently undergoing treatment at _____, _____,
_____, LA ____ for the injuries sustained in this accident.

12.

From _____, 20____ through _____, 20____, I was employed by
_____ at \$____ per hour and performing clerical work. From ____ to present, I
am employed with _____ as a cashier at \$____ per hour.

13.

On _____, 20____, I was involved in an automobile accident at which time I
sustained jaw, shoulder and back pain. I received medical treatment from _____,
_____, _____ and _____. A suit was never filed in
connection to this accident.

14.

- (1) Not known at this time.
- (2) Not known at this time.
- (3) Not known at this time.

15.

I am not claiming lost earning or loss of earnings capacity.

16.

See attached.

17.

No statements were taken from any individuals as to the nature of this accident.

18.

At this time, we are unsure of who will be called as a witness for the defense.

19.

See Number 18 above.

20.

See attached.

21.

I was driving at approximately 45 miles per hour at the time I became aware that an accident might result.

22.

Suddenly appeared in my lane of travel, giving me no time to try to avoid an accident.

23.

Unknown.

24.

I was driving at approximately 45 miles per hour at the moment of impact.

Respectfully Submitted,

Attorney for Plaintiff

_____, LA ____
(____)_____