

\_\_\_\_\_,  
ET VIR  
VERSUS  
\_\_\_\_\_

: \_\_\_\_\_ JUDICIAL DISTRICT COURT  
: DOCKET NO. \_\_\_\_  
: PARISH OF \_\_\_\_\_  
: STATE OF LOUISIANA

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**ANSWERS TO INTERROGATORIES**

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

1.

Plaintiff's full name is \_\_\_\_\_ (\_\_\_\_\_), Post Office Box \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana, \_\_\_\_\_. Social Security No. \_\_\_\_\_ and Plaintiff is married.

2.

Plaintiff has a \_\_\_\_\_ degree from \_\_\_\_\_, 20\_\_\_\_; \_\_\_\_\_.

3.

- A. (1) \_\_\_\_\_, \_\_\_\_\_, Louisiana, \_\_\_\_\_;  
(2) \_\_\_\_\_ of \_\_\_\_\_ (self-employed).
- B. See answer to A-1.
- C. Approximately \$\_\_\_\_ per hour from \_\_\_\_\_, part time employment.

4.

Plaintiff contends that she has lost time since the date of this accident from her job of Hair Weaving due to the fact that she is unable to sit or stand for times required to perform said services. Each client that Plaintiff is unable to service as a \_\_\_\_\_ costs her anywhere from \$\_\_\_\_ to \$\_\_\_\_ per client.

5.

Plaintiff has not been involved in any accident either prior to or subsequent to this incident.

6.

On \_\_\_\_\_, 20\_\_\_\_, Plaintiff slipped and fell at \_\_\_\_\_. As a result of this slip and fall, Plaintiff landed on her buttocks. Plaintiff suffers from lower back pain and pain in her SI joint as a result of the injury sustained and embarrassment as a result of slip and

fall. Plaintiff also suffers from sleeplessness because of pain.

7.

Plaintiff has been treated at the following medical facilities or by the following medical practitioners:

1. \_\_\_\_\_ Hospital, \_\_\_\_\_, \_\_\_\_\_, Louisiana \_\_\_\_\_, Phone No. \_\_\_\_\_.

2. \_\_\_\_\_ Center, \_\_\_\_\_, \_\_\_\_\_, Louisiana, \_\_\_\_\_, Phone No. \_\_\_\_\_.

3. Dr. \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana, Phone No. \_\_\_\_\_.  
Medical Testimony.

4. Dr. \_\_\_\_\_, Phone No. \_\_\_\_\_. Medical Testimony.

5. Dr. \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana, Phone No. \_\_\_\_\_.  
Medical Testimony.

6. Dr. \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana, Phone No. \_\_\_\_\_.

Medical Testimony.

7. Dr. \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana, Phone No. \_\_\_\_\_.

Medical Testimony.

8. \_\_\_\_\_, Physical Therapist, \_\_\_\_\_, \_\_\_\_\_, Louisiana, Phone No. \_\_\_\_\_. Medical Testimony.

9. \_\_\_\_\_, PT, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Louisiana. Medical Testimony.

10. \_\_\_\_\_, M.D., \_\_\_\_\_, \_\_\_\_\_, Louisiana.

8.

Plaintiff had no problems prior to this accident.

9.

Plaintiff is still receiving medical services from Dr. \_\_\_\_\_, Psychiatrist, date of last treatment was \_\_\_\_\_, 20\_\_\_\_. She is also receiving medical services from Dr. \_\_\_\_\_, date of last treatment was \_\_\_\_\_, 20\_\_\_\_, and is soon scheduling surgery with Dr. \_\_\_\_\_.

10.

Plaintiff is currently receiving medical treatment for the injuries suffered.

11.

Plaintiff has provided all names of Doctors or Medical Practitioners by whom she has been treated.

12.

Within the last ten (10) years, Plaintiff has been treated by Dr. \_\_\_\_\_, \_\_\_\_\_, Louisiana, \_\_\_\_\_, Phone No. \_\_\_\_\_.

13.

Plaintiff had no illness, sickness or disease prior to this incident. Plaintiff has had cosmetic surgery prior to this incident.

14.

Plaintiff has never been convicted of any crime.

15.

Amount is undeterminable at this time.

16.

Plaintiff's answer to Interrogatory 16 as follows:

- A. The host, \_\_\_\_\_ (last name unknown), at \_\_\_\_\_; \_\_\_\_\_.
- B. The manager at \_\_\_\_\_ (name unknown).
- C. \_\_\_\_\_, \_\_\_\_\_.
- D. Attorney \_\_\_\_\_ has exhibits that will be introduced at the trial.
- E. Plaintiff has not obtained the services of an expert at this point, but will so advise counsel for Defendant if and when an expert is obtained.

17.

There have been no recorded or written statements obtained by Plaintiff or attorneys for Plaintiff.

18.

Plaintiff, \_\_\_\_\_, spoke with the maitre d' of \_\_\_\_\_, and the manager of same but took no recorded statements.

19.

See answers to Interrogatory No. 7.

20.

A. All medical witnesses will testify as to their medical findings as it pertains to Plaintiff, \_\_\_\_\_ and \_\_\_\_\_ (last name unknown), maitre d' at \_\_\_\_\_, and \_\_\_\_\_, will testify as to facts relative to the incident in

question.

21.

Any and all medical records including receipts of medical bills.

Respectfully Submitted,

\_\_\_\_\_

\_\_\_\_\_  
Attorney for Plaintiff

\_\_\_\_\_, LA \_\_\_\_  
(\_\_\_\_)\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
Attorney for Plaintiff

\_\_\_\_\_, LA \_\_\_\_  
(\_\_\_\_)\_\_\_\_\_

LA. Bar Roll No. \_\_\_\_

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing has been forwarded by U.S. Mail, postage prepaid, and correctly addressed to opposing counsel of record.

\_\_\_\_\_, Louisiana, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_

\_\_\_\_\_

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