

_____ : _____ JUDICIAL DISTRICT COURT
VS : PARISH OF _____, LOUISIANA
_____ : DOCKET NO. _____

INTERROGATORIES

TO: _____
through their attorney of record,

_____, LA _____

These interrogatories are propounded by defendant to plaintiff to be answered in writing and under oath in chronological order within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, et seq., and these Interrogatories are to be deemed continuing and shall be answered without the necessity of propounding additional Interrogatories.

INTERROGATORY NO. 1

Please provide a list of every individual, fact or expert that you may call to testify at the trial of this matter, as well as a brief description of their proposed testimony.

INTERROGATORY NO. 2

Please provide a list of every document you intend to introduce and/or use as demonstrative evidence at the trial of this matter.

These Interrogatories are to be deemed continuing so as to require supplemental answers, under oath, in writing, from plaintiffs at any time that additional information may be obtained after responses are filed to these Interrogatories, which would be furnished if the Interrogatories should be continuously repeated.

Attorney for Defendant

_____, LA _____
(____)_____

_____ : _____ JUDICIAL DISTRICT COURT
VS : PARISH OF _____, LOUISIANA
_____ : DOCKET NO. _____

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: _____
through their attorney of record,

_____, LA _____

NOW INTO COURT through undersigned counsel, comes _____,
Defendant herein, who hereby requests, pursuant to Article 1461, et. seq. of the Louisiana Code
of Civil Procedure, that the plaintiff, _____, hereby produce and permit
defendant=s representatives to inspect and copy the following to wit:

REQUEST FOR PRODUCTION NUMBER 1:

A copy of each and every document you intend to introduce and/or use as demonstrative
evidence at the trial of this matter.

A copy of these documents can be mailed to _____,
Louisiana _____.

WHEREFORE, it is requested that the plaintiff produce the foregoing and numbered
materials within fifteen (15) days of service thereof between the hours of _____ o'clock _____.M.
and _____ o'clock P.M. for inspection and copying by the plaintiff, by bringing or mailing same
to the law office of _____, at _____,
Louisiana _____.

Attorney for Defendant

_____, LA _____
(____) _____