

**IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI
JUDICIAL DISTRICT**

PLAINTIFF

VS.

NO.

DEFENDANT

**FIRST INTERROGATORIES TO PLAINTIFFS
BY DEFENDANTS**

COMES Defendants, and and files this their First Set of Interrogatories unto Plaintiffs in accordance with the Mississippi Rules of Civil Procedure. Said Interrogatories shall be answered within thirty (30) days of this request.

INTERROGATORY NUMBER 1: Please state the name, address and phone number of each and every person who has knowledge of any discoverable matter.

INTERROGATORY NUMBER 2: Please state the name, address and phone number of any expert which you intend to call at the trial of this cause and state and state for any such expert his/her field of expertise, résumé of qualification, opinion, facts and other documents which support the opinion and any supporting authority for said opinion.

INTERROGATORY NUMBER 3: Please state the name, address and phone number of each and every person who has examined the foundation or other structural part of the subject residence in connection with any repair thereof or in connection with the subject suit.

INTERROGATORY NUMBER 4: Please state, in detail, all actions taken by you to market the subject residence for sale.

INTERROGATORY NUMBER 5: Please state the name, address and phone number of any and every person who has taken photographs, prepared diagrams, blueprints or video

pictures of the foundation and other parts of the subject residence in connection with this suit.

INTERROGATORY NUMBER 6: Please describe, in detail, all facts leading up to your purchase of the subject residence, including (a) the date of each contact or communication regarding the subject residence (b) the date you contend Defendants made the alleged statement that the foundation had "no foundation problems", (c) the nature and date of any other verbal conversations which you contend were verbal agreements in connection with the purchase of said residence and (d) the number of times you inspected said residence and dates.

INTERROGATORY NUMBER 7: Please state in reference to any appraisals you have made of the subject property the name of the appraiser, his/her address and phone number and the amount of appraised value.

INTERROGATORY NUMBER 8: Please state, in detail, all facts that support your allegation that you are entitled to damages for loss of sleep and rest, and past and present mental anguish and future mental anguish.

INTERROGATORY NUMBER 9: Please state the factual and legal basis for your claim for attorney's fees.

INTERROGATORY NUMBER 10: Please state all facts and circumstances to support your allegations that the alleged foundation problems were not obvious or noticeable to you during your inspection of the subject residence.

INTERROGATORY NUMBER 11: Plaintiffs contend that you purchase the subject house "as is" and that you agreed to "make the needed repairs". Please state, in detail, all facts and circumstances to support your allegation that said statement is untrue and include wherein whether or not the subject contract between you and Defendants provided that the home was sold "as is".

INTERROGATORY NUMBER 12: Please describe, in detail, the exact type of foundation or other work performed which is the subject matter of your suit including the exact location of any such repair and nature and extent of any such repair.

INTERROGATORY NUMBER 13: Please state whether or not you were invited to

survey and inspect the property unescorted on any occasion. Please state whether or not you had a professional foundation person inspect the subject property prior to the purchase thereof.

INTERROGATORY NUMBER 14: Please describe, in detail, all facts and circumstances to support your allegation that Defendants covered or hid the alleged foundation problems with the residence. Include in your response each and every act which you complain Defendant did to cover foundation problems.

INTERROGATORY NUMBER 15: Please state in reference to your view of the residence prior to purchase any cracks or other indication of potential foundation problems.

INTERROGATORY NUMBER 16: Please state whether or not Defendants invited you to view specific foundation problems, which they had repaired.

INTERROGATORY NUMBER 17: Please state whether or not the house was first offered for sale for \$ but that you purchased the home for \$.

INTERROGATORY NUMBER 18: Please state whether or not the carpet has been replaced in the living room, hall and bedroom. If yes, please state the date it was so replaced and describe any cracks or other evidence of foundation problems, which were evidenced when the carpet was removed.

Respectfully submitted,

Attorney for

Of counsel:

Telephone:

MSB #
Attorney for

CERTIFICATE OF MAILING

I, _____ do hereby certify that I have this day, by U. S. Mail, postage prepaid, a true and correct of the above and foregoing Interrogatories to

This the _____ day of _____, 20____.
