

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANT

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

COMES NOW Plaintiff, (" ") and hereby propounds the following interrogatories to Defendant, (" "), and requests Defendant to answer these interrogatories in the time and manner as provided for by Rule 33 of the Mississippi Rules of Civil Procedure. Plaintiff gives notice that these interrogatories are continuing in nature and are to be supplemented during the course of this litigation in accordance with Rule 33.

PART I

To avoid endless repetition, take notice that the definitions in Plaintiff's First Request for Production of Documents, served simultaneously herewith, are incorporated herein by reference and are applicable in responding to these interrogatories.

PART II

INTERROGATORY NO. 1: Identify by name, address and present whereabouts, each person whom you will call or may call as an expert witness at the trial of this case and state after each person:

- A. His/Her qualifications and curricula vitae;
- B. The subject matter on which the expert is expected to testify;
- C. The substance of the facts and opinions to which the expert is expected to testify;
- D. A summary of the grounds for each opinion; and

E. Identify all documents upon which each expert has relied in reaching his/her opinion in this case and or on which each opinion is based.

INTERROGATORY NO. 2: Identify by name, address and present whereabouts each person other than an expert whom you will call or may call as a witness at the trial of this case and state after each person the subject or subjects upon which he/she is expected to testify.

INTERROGATORY NO. 3: Identify by name, address and present whereabouts all persons who claims to have knowledge of the facts and claims set forth in your Answer and/or other response to 's Complaint. For each such person, your answer should identify what knowledge it is you claim that each person has and all documents which reflect that knowledge.

INTERROGATORY NO. 4: Identify all documents which you claim support the facts and claims set forth in your Answer and/or other response to 's Complaint. Each document should be listed by date, prepared, subject, to whom sent, all persons who have seen the document and all places and files where it has been kept.

INTERROGATORY NO. 5: Identify any contacts or communications, written or oral, which you have had with any customer of during the period from to and from , to present and for each contact or communication, state:

- A. The date and nature (e.g. telephone, in person) of the contact or communication;
- B. The persons involved; and
- C. The substance of the contact or communication.

INTERROGATORY NO. 6: Except for work performed during normal business hours while an employee of , identify every person or entity for whom you performed any work, services or labor or to whom your provided any parts, and for each such person or entity, state:

- A. The date of the work, services, labor or parts were provided;
- B. The name, address and telephone of person or entity involved;
- C. A description of work, labor, services or parts provided;
- D. The amount and nature of the compensation received; and
- E. Identify all documents arising out of, connected with or related to performing or providing any such work, labor, services or parts.

INTERROGATORY NO. 7: Identify any contacts or communications, written or oral, which you have had with any past or present employee of _____ since the date of your termination, and for each contact or communication, state:

- A. The date and nature (e.g. telephone, in person) of the contact or communication;
- B. The persons involved; and
- C. The substance of the contact or communication.

INTERROGATORY NO. 8: Set forth in narrative form, any relationships, other than purely business or work related, which you have or have had with any present or former employee of _____.

INTERROGATORY NO. 9: Set forth in narrative form, the facts and circumstances related to the negotiation and purchase of your ownership interest in _____.

INTERROGATORY NO. 10: Set forth in detail, all income, revenue or other money, which you received from _____, _____ to present, including the amount, source and period for which it was received.

INTERROGATORY NO. 11: Set forth and explain in narrative form, all efforts undertaken by you to form or operate any type of business venture, whether full or part time, to hire employees or to obtain or solicit customers, and state:

- A. The date of any such undertaking;
- B. The name, address and telephone of persons or entities involved; and
- C. Identify all documents arising out of, connected with or related to any such undertaking.

INTERROGATORY NO. 12: Set forth all positions of employment, whether full or part time, which you have held or for which you have applied, from _____ to present.

INTERROGATORY NO. 13: Identify all persons who furnished information to you in answering these interrogatories, specifying for each person the interrogatory for which he/she furnished information.

THIS, the _____ day of _____, _____.

Respectfully submitted,

By: _____

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I, _____, Attorney for Plaintiff, have mailed this day, by U.S. Mail, postage fully prepaid, a copy of the above and foregoing document to _____, Attorney for Defendant.

This the _____ day of _____, _____.
