

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

and DEFENDANTS

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
AND REQUEST PRODUCTION OF DOCUMENTS AND THINGS
TO DEFENDANT**

COMES NOW Plaintiff, , by and through counsel, and propounds his/her First Set of Interrogatories and Request for Production of Documents and Things to the Defendant, and would ask that they be answered in the manner and time as set forth in said Rules;

1. Please state the names, mailing addresses and telephone number of the principal stockholders of the hospital/company/corporation.

2. Please give the names, mailing addresses and telephone numbers of all officers of the hospital/company/corporation.

3. Please give the mailing address and telephone number of the principal place of business of said hospital/company/corporation.

4. Please give the names, mailing addresses and telephone numbers of the person and/or persons in charge of hiring and supervising all employees.

5. Has a claim for malpractice for negligence in an incident similar to that concerning been made against you other than the complaint in this action within the last () years? If so, please state the name, address, telephone number of each claimant, the case number and which court the action was filed.

6. By way of production of documents, please provide the records and any and all reports regarding similar instances in the last () years.

7. Has , its predecessors, successors, assigns, agents, representatives, employees, stockholders, officers and/or others either directly or indirectly ever been cited, fined, admonished, reprimanded and/or had to answer to any regulatory agency or authority, whether local, state or federal, regarding its care, services and personnel or the lack thereof?

8. Has any agent of the hospital/company/corporation ever testified in court in a malpractice case either as a defendant or as a witness or ever given a deposition under oath? If any of the answers are in the affirmative, please give the date, name of the court action, the case number and the attorneys involved.

9. During the time the plaintiff was under your treatment and care was there in effect one or more policies of insurance by or through which you are or were insured in any

manner or to any extent? By way of production of documents and/or things, please furnish a copy of said insurance policy.

10. On or about _____, was Plaintiff treated in the emergency department of your hospital? If your answer is in the affirmative, please state the treatment she received.

11. On _____, what was the employment position of _____ at your facility?

12. Is there a policy at your facility which requires your physicians to review X-rays which have been read by the radiology department?

13. By way of production of documents, please provide a copy of any incident report regarding the misdiagnosis of Plaintiff's fracture.

14. State the name, address and telephone number of each and every nurse, assistant and/or employee who took part in the treatment of the Plaintiff and what the duties of each were.

15. With respect to the foregoing interrogatory and particularly with respect to each individual named above, please fully detail what each of the foregoing individuals did, what their responsibility was and fully detail and describe what each individual should do to properly administer the treatment and care of Plaintiff.

16. What is the name, last known address, present whereabouts, telephone number and place of employment of each person known or believed by you or anyone acting on your behalf to:

- a. Have been an eyewitness to the events or incidents in this case;
- b. Have been within sight or hearing of the incident or event;
- c. Have firsthand knowledge of the facts and circumstances of the incident or of the event leading up to or following it;
- d. Have any knowledge of relevant conditions at the scene of the incident or event existing prior to and/or after the same;
- e. Have any other knowledge of discoverable facts;
- f. Please set forth the names, addresses and telephone numbers of those who may be called as witnesses at trial and the expected oral testimony of said witnesses.

17. Please state the names and addresses and telephone numbers and occupations of any expert witnesses you plan to call to testify in this lawsuit. In regards to this interrogatory;

- a. Please state what qualifies these witnesses as experts in the field in which they plan to testify;

b. Please give a summary of what each of these witnesses' intended testimony is.

18. Please state the names, addresses and telephone numbers of all witnesses you expect to call at the trial of this matter and give a brief statement of the substance of their testimony.

19. By way of production of documents, please provide any and all reports, correspondence, writings, pleadings, responses to discovery, or other documents which reflect complaints and/or lawsuits against you.

20. By way of production of documents please provide all documents tests, reports, tangible things, records or other evidence to be introduced at the trial of this cause by you or on your behalf.

21. By way of production of documents, please provide all reports, tests, examinations or other documents, which any person has produced for the Defendant for purposes of this cause of action.

22. By way of production of documents, please provide all written statements, recordings, telephone messages, or other documents or writings which reflect in any way or are in any way concerned with this cause of action and the treatment of Plaintiff.

23. By way of production of documents, please provide all correspondence, memoranda, reports, and/or other documents made by any insurance company, its employees, adjuster, or anyone in its behalf concerning the treatment of plaintiff.

24. By way of production of documents, please provide any and all witness statements however relevant to the occasion in question, written, recorded, or otherwise taken by agents, employees, investigators, adjusters or anyone acting for and on behalf of Defendant.

25. By way of production of documents, please provide any and all documents and things which contain information upon which Defendant used to answer or form which was used to gather information which went into, or was otherwise consulted or seen in connection with the preparation of Defendant's answer to the Complaint filed by Plaintiff.

26. By way of production of documents or things, please provide, for inspection and copying and/or make available for on site inspection, the original of all the following:

a. Any and all doctors, records or notes which in any way pertain to the treatment, advice, examination, testing or monitoring of the Plaintiff;

b. All nurses' notes;

c. All hospital records pertaining to Plaintiff;

d. All documents relating to the findings from test;

e. All x-rays, x-ray films and x-ray reports;

f. All manuals, procedures, operating instruction, treatises or other instructions or documents which in any way relate to the proper procedure to an individual, including but not limited to, the Plaintiff.

g. Any consent form signed by Plaintiff.

27. By way of production of documents, please provide any and all documents, reports, memoranda, articles, books, or other writings of whatever nature written, prepared, edited or authored by any and all experts employed or consulted by Defendant or anyone on their behalf.

28. By way of production of documents, please provide any and all documents relating to your employment of employees who were involved in the treatment of Plaintiff and specifically, and .

29. By way of production of documents, please provide any written guidelines you have regarding the hiring of employees.

30. Has anyone answering these interrogatories ever been convicted of a misdemeanor or felony?

31. Do you acknowledge that your answers to these interrogatories are given under oath before an authority who swears you to tell the truth under penalty of perjury and a duty to supplement these interrogatories.

The foregoing interrogatories and request for production of documents and things are directed to the Defendant, , on this, the day of , .

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for