

**UNITED STATES DISTRICT COURT
DISTRICT OF MISSISSIPPI
DIVISION**

PLAINTIFF

V.

CIVIL ACTION NO.

DEFENDANT

INTERROGATORIES AND REQUEST FOR PRODUCTION

COMES Defendant, Corporation, and files its Interrogatories and Request for Production to the Plaintiff as follows:

INTERROGATORY NO. 1: Give the names, residence addresses, business addresses and telephone numbers of all persons whom Plaintiff or Plaintiff's attorneys know or believe (a) to have been witnesses to the accident described in the Complaint or (b) to have been present at the scene of the accident immediately after the accident.

INTERROGATORY NO. 2: In regard to any marriages of Plaintiff, please state:

- a. The full name of Plaintiff's spouse and such spouse's present street address;
- b. The name and address of such spouse's employer, if any;
- c. Full names, ages and present street addresses of any children;
- d. Dates of marriage; and
- e. If any marriage was terminated by divorce, state where and when such divorce action was filed.

INTERROGATORY NO. 3: Please give Plaintiff's employment history (including self-employment) by furnishing the names and business addresses of all of (a) Plaintiff's employers; (b) Plaintiff's immediate supervisors; (c) The jobs that Plaintiff performed and (d) The approximate dates of such employment.

INTERROGATORY NO. 4: If Plaintiff has ever applied for and/or received any unemployment, social security, disability income or insurance or any Workmen's Compensation benefits from any agency, company, person, corporation, state or government, state the nature of any such payments and by whom paid, the dates of any such payments and the basis for such payments.

REQUEST NO. 1: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 5: In the event that Plaintiff or Plaintiff's attorneys have employed any expert witnesses in preparation for testimony at the trial of this case, state:

- a. The name, business address and telephone number and details of the education and qualifications of any such expert witness and attach a copy of his resume and/or curriculum vitae to the answer to these interrogatories;
- b. The subject matter upon which the expert witness is expected to testify;
- c. The facts known by any such expert;
- d. The opinions held by any such expert and a summary of the grounds for each opinion.

REQUEST NO. 2: It is hereby requested that all articles, books, papers, documents and anything in writing which the Plaintiff's expert(s) has/have consulted in formulating his/her/their opinion(s) in this case and/or which he/she/they plan to use in preparation for or at the trial of this case be furnished to this Defendant.

INTERROGATORY NO. 6: State the names and occupations, employer, business addresses, telephone numbers and approximate dates thereof, of all persons who have had possession, custody or control of the _____, VIN _____, (hereinafter referred to as "subject vehicle") or any parts thereof (specifying which parts) since the date of the accident.

REQUEST NO. 3: It is hereby requested that the Plaintiff produce all parts of the subject vehicle in the possession, custody or control of the Plaintiff or Plaintiff's attorneys (to be made available at a reasonable time and place agreed to by the attorneys for the Plaintiff and this Defendant).

INTERROGATORY NO. 7: State whether the subject vehicle or any of its parts was ever inspected or tested by anyone following the accident and, if so, give the following information:

- a. The names, employers, business and residence addresses and telephone numbers of all such persons present and those who were inspecting and/or testing and specifying what each person did;
- b. The dates of such inspections or tests;
- c. If any testing was done, the particular part that was tested, the exact test that was performed and the results of such test;
- d. The street address and exact location of the place where such vehicle or part(s) were inspected or tested.

REQUEST NO. 4: It is hereby requested that all documents relating to any such testing and/or inspection be furnished to this Defendant.

INTERROGATORY NO. 8: In regard to the allegations of (a) Paragraph 19 of the Complaint, (b) Paragraph 20 of the Complaint, (c) Paragraph 21 of the Complaint, (d) Paragraph 25 of the Complaint, (e) Paragraph 26 of the Complaint, (f) Paragraph 27 of the Complaint, (g) Paragraph 29 of the Complaint, and (h) Paragraph 34 of the Complaint please state in detail what evidence the Plaintiff or Plaintiff's attorneys have as to each allegation, giving specific facts, and state the name, employment, address and telephone number of all persons having knowledge of the same.

REQUEST NO. 5: It is hereby requested that all documents which purportedly support each of such allegations of the Complaint be furnished to this Defendant.

INTERROGATORY NO. 9: State whether or not Plaintiff sustained any injuries in any type of accident or occurrence before the date of the accident complained of herein or any injuries in said

manner after the date of the accident complained of herein. If your answer is that Plaintiff had sustained any, state the date, location, parties and circumstances surrounding each such accident or occurrence, the injuries sustained and the names and addresses of the doctors treating plaintiff for said injuries and any hospital rendering treatment. Also if Worker's Compensation proceedings or lawsuits resulted therefrom, please state the name of the Court or Courts or Workmen's Compensation Commission and the location of same.

REQUEST NO. 6: It is hereby request that all documents relating to the same be furnished to this Defendant.

REQUEST NO. 7: It is hereby requested that all documents relating to hospitalization of Plaintiff for any injuries resulting from the subject accident be furnished to this Defendant.

INTERROGATORY NO. 10: Please state every time that the Plaintiff has been treated by a physician, psychiatrist or psychologist for any injury, sickness, disease, emotional or mental problem during the past ten (10) years, giving the name and address of the physician, psychiatrist or psychologist, the date of the treatment and the nature of the injury, sickness, disease, emotional or mental problem for which Plaintiff was treated.

REQUEST NO. 8: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 11: Please list every occasion when Plaintiff was confined to a hospital during the past ten (10) years and state:

- a. The dates of such confinement;
- b. The name and address of the hospital where Plaintiff was treated;
- c. The nature of the injury, sickness, disease or emotional or mental problem for which Plaintiff was treated; and
- d. The physicians, psychiatrists or psychologists who treated them.

REQUEST NO. 9: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 12: Has Plaintiff ever been involved in any legal action of any type whatsoever either as a Defendant or as a Plaintiff? If so, state:

- a. The date and place each such action was filed, the Court involved, the name of the other party, the cause number of such action and the names of the attorneys representing the respective parties;
- b. Whether Plaintiff was a Plaintiff or Defendant in such action;
- c. A description of the nature of each such action; and
- d. The result of such legal action.

INTERROGATORY NO. 13: State the names, occupations, employer, business addresses and telephone numbers of all persons whom you or your attorneys know or believe to have taken photographs of (a) the subject vehicle and/or its parts or (b) the accident scene at any time following the accident.

REQUEST NO. 10: It is hereby requested that the negatives and/or prints of all such photographs be furnished to this Defendant for copying.

INTERROGATORY NO. 14: Specify and particularize (a) all injuries Plaintiff allegedly received in the accident and (b) all injuries caused by the alleged failure of the shoulder harness.

INTERROGATORY NO. 15: Has the Plaintiff either agreed to or received any payment from another person, firm or company as a compromise settlement of any claims for injuries and damages sustained resulting from the subject accident? If so, state:

- a. The amount agreed upon or received;
 - b. The name and address of the person, firm or company making such payment;
 - c. The name and address of the person, firm or company for whose benefit the payment was made;
- and

d. The type of document concluding such compromise settlement.

REQUEST NO. 11: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 16: State the names, employers, business and residence addresses and telephone numbers of all persons whom you or your attorneys know or believe to have made any investigation of the subject accident.

INTERROGATORY NO. 17: State whether Plaintiff has ever been arrested and charged with any crime. If the answer is "yes", give the name of the court or courts, location of the same, the nature of the crime with which Plaintiff was charged, whether there was a plea of guilty or a conviction and the dates thereof.

INTERROGATORY NO. 18: State the name, address, telephone number, employer and employer's address of every person who has given a statement of any type concerning the accident involved in this action.

INTERROGATORY NO. 19: In regard to each such statement referred to in your answer to the preceding interrogatory, state:

- a. The name, address and employer of the person to whom the statement was made;
- b. The date(s) thereof;
- c. Whether oral, in writing or recorded on tape;
- d. At whose request it was made; and
- e. The name, address and telephone number of the person who has present custody or possession of the same.

REQUEST NO. 12: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 20: State the name, address and telephone number of the person(s) and/or wrecker service or other business which removed the subject vehicle from the scene of the accident.

REQUEST NO. 13: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 21: Please itemize Plaintiff's alleged loss of wages and/or income due to the subject accident and the source of such loss.

REQUEST NO. 14: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 22: State the name, address and responsible person(s) in the business, firm or company which had any insurance coverage on the subject vehicle applicable to the subject accident.

REQUEST NO. 15: It is hereby requested that all documents relating to the same be furnished to this Defendant.

INTERROGATORY NO. 23: If the subject vehicle has been involved in any accident or has been damaged in any way, other than the subject accident, describe each accident and each item of damage, and identify all persons having knowledge of any such accident and damage.

REQUEST NO. 16: It is hereby requested that all documents involving the subject vehicle which related to (a) its purchase and ownership, (b) its maintenance and/or repair and (c) its damage and repair or salvage following the subject accident be furnished to this Defendant.

REQUEST NO. 17: It is hereby requested that all states for medical, doctor, hospital and drug expenses relating to any injuries sustained by Plaintiff as a result of the subject accident be furnished to this Defendant.

REQUEST NO. 18: It is hereby requested that (a) all medical reports, findings and opinions relating to examinations, diagnoses, treatments and prognoses relating to any injuries of Plaintiff sustained in the subject accident and (b) a signed medical authorization (attached herewith) permitting this Defendant's attorneys to obtain any such record be furnished to this Defendant.

REQUEST NO. 19: It is hereby requested that all written or recorded documents, applications, claim form, statements or reports or correspondence or the Plaintiff (except to Plaintiff's attorneys), furnished to anyone relating to the circumstances of this accident be furnished to this Defendant.

REQUEST NO. 20: It is hereby requested that all documents of any investigating agency, city, county, state or federal, regarding the accident be furnished to this Defendant.

REQUEST NO. 21: It is hereby requested that the Plaintiff furnish to this Defendant copies of federal income tax returns, if any, of Plaintiff for the year _____ and subsequent years.

Respectfully submitted,

Attorney for