

INTERROGATORY NO. 1

Please identify yourself completely including your full name, date of birth, marital status, home address (now and at the time of the accident if different), occupation, and business address.

INTERROGATORY NO. 2

Please state the name and address of the owner of the motor vehicle being operated by the driver of the defendant vehicle herein at the time of the collision.

INTERROGATORY NO. 3

Identify by name, address and telephone number the liability insurance carrier on the motor vehicle involved in the accident which is the basis of this suit.

INTERROGATORY NO. 4

Is your insurance carrier defending this suit on your behalf under a reservation of rights?

INTERROGATORY NO. 5

If the answer to interrogatory number 2 is in the affirmative, please state each and every reason for your insurance carrier denying that you are covered by its insurance policy.

INTERROGATORY NO. 6

State the amount of coverage contained in your insurance policy.

INTERROGATORY NO. 7

In the event there is no insurance coverage available to Plaintiffs in this cause, state the net worth of each Defendant identifying the net worth by the date said net worth was ascertained.

INTERROGATORY NO. 8

Identify by name, address and telephone number the insurance agent, or agency, from which you purchased liability insurance covering the motor vehicle owned by you which is the basis of this suit.

INTERROGATORY NO. 9

Identify by name, address and telephone number the name of any company or companies which have issued liability insurance coverage on the motor vehicle owned by you, involved in the accident, which is the basis of this suit.

INTERROGATORY NO. 10

If no policy of insurance was ever issued on the motor vehicle owned by you, involved in the accident, which is the basis of this suit, state whether or not there was ever a binder of insurance coverage issued on the vehicle.

#### INTERROGATORY NO. 11

State the name and present or last known address of persons from whom oral statements have been obtained on your behalf either before or after the commencement of this suit concerning the facts alleged and the pleadings and the subject of this action, and state as to each person the date each oral statement was taken, the specific subject of each oral statement, the name and present or last known address of the person who took the oral statement, and the method used for recording, transcribing or taking each oral statement.

#### INTERROGATORY NO. 12

Please state the name and address or information for the location of every person known to, or reasonable believed by you, your agents, attorneys, investigators, or other representatives, to have been an eye witness to the accident or incident herein involved.

#### INTERROGATORY NO. 13

Please state the name and address or information for the location of every person known to, or reasonable believed by you, your agents, attorneys, investigators, or other representatives, other than an eye witness, who have purported to have knowledge or information of any fact pertaining to this controversy.

#### INTERROGATORY NO. 14

If you or any of your representatives have employed an expert, other than an attorney, to act on your behalf with respect to any matter resulting from the accident, identify each such expert by name, business address, residence, and field of specialization specifying whether he or she: is expected to testify at trial on your behalf, has been specially retained or employed in anticipation of litigation but is not expected to so testify, or is a salaried employee in your regular employ or that of any of your representatives.

#### INTERROGATORY NO. 15

With respect to each expert who is in such regular employ or is expected to testify at your trial on your behalf, state; the experts name, the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds of each opinion held by the expert.

#### INTERROGATORY NO. 16

Identify with particularity sketches, diagrams; and/or photographs made and/or taken on your behalf either before or after the commencement of this suit concerning the facts alleged in the pleadings and the subject of this action, including: the name and present or last

known address of the persons making and or taking each sketch, diagram, and or photograph, the specific subject of each sketch, diagram and/or photograph, and the name and present or last known address of the persons in physical possession of each sketch and/or diagram and/or photograph and all copies thereof.

INTERROGATORY NO. 17

Please state each and every fact on which you rely as tending to show any negligence or lack of care of any kind on the part of the Plaintiff.

INTERROGATORY NO. 18

Have you been informed that your answers to these interrogatories are made under oath?

INTERROGATORY NO. 19

Have you been informed that your answers to these interrogatories may constitute a part of your testimony at the trial of this case?

INTERROGATORY NO. 20

Please identify yourself fully, giving your full name, age, residence address, and if married, the name and place of employment of your spouse.

INTERROGATORY NO. 21

Are you presently employed? If so, give your present occupation, the name and address of your employer, the dates of employment, your duties and income.

INTERROGATORY NO. 22

Please state whether or not you were the operator of a motor vehicle at or about the time and place of the occurrence involved in this case. If you were, give a full and complete description of the vehicle you were driving at the time of the occurrence.

INTERROGATORY NO. 23

Identify by name and address the owner of the motor vehicle you were operating at the time of the occurrence in this case.

INTERROGATORY NO. 24

If you were not the owner of said vehicle, did you have the permission of the owner to drive the vehicle:

- (a) generally; or
- (b) at the specific time of the occurrence?

#### INTERROGATORY NO. 25

Describe the general mechanical condition of the motor vehicle owned and/or operated by yourself at the time of the collision in question and also:

- (a) State when, from whom and where you acquired said vehicle;
- (b) State when, where, and by whom the said vehicle was last inspected for mechanical defects prior to the time of the occurrence made the basis of this suit;
- (c) State when, where and by whom the brakes on said vehicle were last inspected;
- (d) State when, where and by whom the steering mechanism on said vehicle was last inspected prior to the time of the occurrence made the basis of this suit;
- (e) State when, where and by whom the tires and wheels on said vehicle were last inspected prior to the time of the occurrence made the basis of this suit;
- (f) Describe the condition of the windshield of said vehicle owned and/or operated by you, stating whether or not it was broken, cracked, frosted, or impaired in any manner so as to obscure vision through it at the time of the occurrence made the basis of this suit.

#### INTERROGATORY NO. 26

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 in your behalf to:

- (a) have been an eye witness to the occurrence in this case;
- (b) have been within sight or hearing of the occurrence;
- (c) have first hand knowledge of the facts and circumstances of the occurrence or the events leading up to or following it;
- (d) have any knowledge of relevant conditions at the scene of the occurrence existing prior to and/or after the same;
- (e) have any other knowledge of discoverable facts?

#### INTERROGATORY NO. 27

Are you or your attorney aware of the existence of any written or recorded statement(s) made by or for any party or witness pertaining to the facts of this case? If so, please state:

- (a) the name of each person making the statement;
- (b) the date of the statement;
- (c) the name, employer, occupation, last known address and telephone number of the person or persons taking the statements;
- (d) the name and last known address and telephone number of the person now in possession of the original statement, or a copy of it.

INTERROGATORY NO. 28

State whether you or your attorneys have retained or specially employed any expert witnesses whom you expect to call at trial, and if so, give that persons full name and address, the subject matter on which such expert or experts are expected to testify, the substance of the facts and opinions to which such expert or experts are expected to testify and a summary of the grounds for each such opinion.

INTERROGATORY NO. 29

Did you or the owner of the motor vehicle you were operating at the time of the occurrence in question have liability, bodily injury and/or collision insurance covering you and/or the vehicle you were operating? If so, please state the name of each company insuring you and/or the vehicle you were operating, including excess carriers, the kind of insurance and the policy limits.

INTERROGATORY NO. 30

Did any of the Plaintiffs, make any statement to any person in your presence as to how the occurrence made the basis of this suit happened? If so, please state what statement was made by the Plaintiffs, the name of the person to whom such statement was made, the name and address of each and every person who heard such statement and the time and date such statement was made.

INTERROGATORY NO. 31

Did you make any statement to any person as to how the occurrence happened? If so, what statement was made by you, give the name of the person to whom such statement was made, give the name and address of each person who heard such statement and give the time and date such statement was made by you.

INTERROGATORY NO. 32

Please state where you were coming from and where you were going at the time of the occurrence in this case, giving in your answer the place and time where you last entered the vehicle, your destination and estimated time of arrival.

INTERROGATORY NO. 33

Had you ever traveled through the intersection of the streets where the occurrence happened prior to the time of the occurrence? If so, state:

(a) the extent of previous travel;

(b) when you had last traveled through such intersection prior to the occurrence.

INTERROGATORY NO. 34

Please describe fully and completely how the occurrence in this case happened, stating in your answer all events relating thereto in their sequential order.

INTERROGATORY NO. 35

Please state in detail everything that you did from the moment you first noticed the Plaintiffs' vehicle until the moment of impact.

INTERROGATORY NO. 36

Please describe the location of the point of impact, path of travel and final resting place of both vehicles, giving in your answer the distances in feet from the curb lines or other fixed objects.

INTERROGATORY NO. 37

Please describe in detail everything you did in an attempt to avoid the occurrence.

INTERROGATORY NO. 38

Please state each and every fact on which you rely as tending to show any negligence or lack of care of any kind on the part of the Plaintiff.

INTERROGATORY NO. 39

In the twenty four hour period proceeding the accident did you have anything of an alcoholic nature to drink, and if so state the name, type, and brand of each drink consumed, the quantity consumed, the name and address of each place of consumption, the exact time of consumption of each drink, the name of any person who was present at the time of your consumption or who witnessed your alcoholic consumption.

INTERROGATORY NO. 40

Have you been informed that your answers to these interrogatories are made under oath.

INTERROGATORY NO. 41

Have you been informed that your answers to these interrogatories may constitute a part of your testimony at the trial of this case?

INTERROGATORY NO. 42

Please identify yourself fully, giving your full name, age, residence address, and if married, the name and place of employment of your spouse.

INTERROGATORY NO. 43

Are you presently employed? If so, give your present occupation, the name and address of your employer, the dates of employment, your duties and income.

INTERROGATORY NO. 44

Please state whether or not you were the operator of a motor vehicle at or about the time and place of the occurrence involved in this case. If you were, give a full and complete description of the vehicle you were driving at the time of the occurrence.

INTERROGATORY NO. 45

Identify by name and address the owner of the motor vehicle you were operating at the time of the occurrence in this case.

INTERROGATORY NO. 46

If you were not the owner of said vehicle, did you have the permission of the owner to drive the vehicle:

- (a) generally; or
- (b) at the specific time of the occurrence?

INTERROGATORY NO. 47

Were you, at the time of the occurrence, the agent, servant or employee of the owner of the motor vehicle you were operating, and acting in the course of the owner's business or employment?

INTERROGATORY NO. 48

Describe the general mechanical condition of the motor vehicle owned and/or operated by yourself at the time of the collision in question and also:

- (a) State when, from whom and where you acquired said vehicle;
- (b) State when, where, and by whom the said vehicle was last inspected for mechanical defects prior to the time of the occurrence made the basis of this suit;
- (c) State when, where and by whom the brakes on said vehicle were last inspected;
- (d) State when, where and by whom the steering mechanism on said vehicle was last inspected prior to the time of the occurrence made the basis of this suit;

(e) State when, where and by whom the tires and wheels on said vehicle were last inspected prior to the time of the occurrence made the basis of this suit;

(f) Describe the condition of the windshield of said vehicle owned and/or operated by you, stating whether or not it was broken, cracked, frosted, or impaired in any manner so as to obscure vision through it at the time of the occurrence made the basis of this suit.

#### INTERROGATORY NO. 49

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 in your behalf to:

(a) have been an eye witness to the occurrence in this case;

(b) have been within sight or hearing of the occurrence; (c) have first-hand knowledge of the facts and circumstances of the occurrence or the events leading up to or following it;

(d) have any knowledge of relevant conditions at the scene of the occurrence existing prior to and/or after the same;

(e) have any other knowledge of discoverable facts?

#### INTERROGATORY NO. 50

Are you or your attorney aware of the existence of any written or recorded statement(s) made by or for any party or witness pertaining to the facts of this case? If so, please state:

(a) the name of each person making the statement;

(b) the date of the statement;

(c) the name, employer, occupation, last known address and telephone number of the person or persons taking the statements;

(d) the name and last known address and telephone number of the person now in possession of the original statement, or a copy of it.

#### INTERROGATORY NO. 51

State whether you or your attorneys have retained or specially employed any expert witnesses whom you expect to call at trial, and if so, give that persons full name and address, the subject matter on which such expert or experts are expected to testify, the substance of the facts and opinions to which such expert or experts are expected to testify and a summary of the grounds for each such opinion.

#### INTERROGATORY NO. 52

Did you or the owner of the motor vehicle you were operating at the time of the occurrence in question have liability, bodily injury and/or collision insurance covering you and/or the vehicle you were operating? If so, please state the name of each company insuring you and/or the



vehicle you were operating, including excess carriers, the kind of insurance and the policy limits.

INTERROGATORY NO. 53

Did the plaintiff make any statement to any person in your presence as to how the occurrence made the basis of this suit happened? If so, please state what statement was made by the Plaintiff, the name of the person to whom such statement was made, the name and address of each and every person who heard such statement and the time and date such statement was made.

INTERROGATORY NO. 54

Did you make any statement to any person as to how the occurrence happened? If so, what statement was made by you, give the name of the person to whom such statement was made, give the name and address of each person who heard such statement and give the time and date such statement was made by you.

INTERROGATORY NO. 55

Please state where you were coming from and where you were going at the time of the occurrence in this case, giving in your answer the place and time where you last entered the vehicle, your destination and estimated time of arrival.

INTERROGATORY NO. 56

Had you ever traveled through the intersection of the streets where the occurrence happened prior to the time of the occurrence? If so, state:

- (a) the extent of previous travel;
- (b) when you had last traveled through such intersection prior to the occurrence.

INTERROGATORY NO. 57

Please describe fully and completely how the occurrence in this case happened, stating in your answer all events relating thereto in their sequential order.

INTERROGATORY NO. 58

Please state in detail everything that you did from the moment you first noticed the Plaintiff's vehicle until the moment of impact.

INTERROGATORY NO. 59

Please describe the location of the point of impact, giving in your answer the distances in feet from the curb lines or other fixed objects.

INTERROGATORY NO. 60

Please describe in detail everything you did in an attempt to avoid the occurrence.

INTERROGATORY NO. 61

Please state each and every fact on which you rely as tending to show any negligence or lack of care of any kind on the part of the Plaintiff.

INTERROGATORY NO. 62

Have you been informed that your answers to these interrogatories are made under oath.

INTERROGATORY NO. 63

Have you been informed that your answers to these interrogatories may constitute a part of your testimony at the trial of this case?