

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

Petitioner/Plaintiff,
Vs. _____ NO. _____
Respondent/Defendant

**DEFENDANT'S SECOND SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

The Defendant, _____, supplements its responses to the Plaintiff's
First Set of Interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 6.: Identify all persons whom Defendant will offer as
witnesses upon any trial of this cause.

RESPONSE: Defendant objects to Interrogatory Number Six in that it requests
information beyond the permissible scope of discovery.

SUPPLEMENTAL RESPONSE: Defendant restates its objections but, without
waiving those objections, would state that it may call as witnesses the following:
_____, those persons listed as having discoverable knowledge in Plaintiff's
responses to discovery;

INTERROGATORY NO. 7.: State in specific factual detail each and every item
supporting the Defendant's affirmative defense of negligence against the Plaintiff.

RESPONSE: Discovery is ongoing in this case and this Interrogatory will be supplemented when discovery has been completed.

SUPPLEMENTAL RESPONSE: Plaintiff was negligent in failing to look where she was walking and in failing to properly watch out for her own safety. See also Plaintiff's deposition.

INTERROGATORY NO. 8.: List and describe each and every document or exhibit which either Defendant expects to use as evidence at trial.

RESPONSE: Defendant has not yet decided which documents or exhibits it will use at the trial of this case. However, this Interrogatory will be supplemented pursuant to the _____ Rules of Civil Procedure.

SUPPLEMENTAL RESPONSE: Defendant expects to use medical records obtained from the Plaintiff or from the Plaintiff's medical providers. Defendant also expects to use Plaintiff's employee records obtained from _____ by subpoena.

RESPECTFULLY SUBMITTED, this the ____ day of _____, 20____.

DEFENDANT

BY: _____

ACKNOWLEDGEMENT

STATE OF _____

COUNTY OF _____

_____, being first duly sworn, on oath, deposes and says that he is manager of _____, that he signs the foregoing Answers on behalf of the Defendant, _____ and is duly authorized to so do; that he has read the foregoing document and knows the contents thereof; that the matters stated in the foregoing document are not within his personal knowledge and that there is no individual employee of _____ who has personal knowledge of all such matters; that said responses were prepared with the assistance of employees and counsel for said Defendant upon which he has relied; that the responses set forth herein, subject to inadvertent and undiscovered errors, are based upon and necessarily limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of those responses; and consequently said defendant reserves the right to make any changes in the responses if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the said responses are true to the best of his knowledge, information and belief.

SWORN TO AND SUBSCRIBED before me this _____ day of _____,
20____.

NOTARY PUBLIC

MY COMMISSION EXPIRES:

CERTIFICATE OF SERVICE

I, undersigned counsel, do hereby certify that, this day, I have forwarded, through U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing SECOND

SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES to
_____ at the following address: _____.

This the _____ day of _____, 20____.