

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

FIRST SUPPLEMENTAL RESPONSE TO PLAINTIFFS' DISCOVERY REQUESTS

COMES NOW the Defendant, _____, ("_____"), through counsel, and supplements its answers to discovery as follows:

INTERROGATORY NO. 6: Identify all reports or investigations undertaken by _____, its employees, agents or insurers in the claims in this case.

ANSWER: No written reports or investigations responsive to this interrogatory were made prior to suit being filed. The Defendant objects to producing any reports or investigations produced after suit being filed, since such information is clearly protected from discovery as being trial preparation materials, mental impressions and/or opinions of a lawyer.

INTERROGATORY NO. 11: State the content of all advertisements of _____, including but not limited to radio, television and newspaper advertisements.

ANSWER: The Defendant objects that this interrogatory seeks production of documents which are not relevant to the issues in this action, and which are not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, _____ only

has copies of advertisements, which were used in newspapers and/or advertising circulars. Copies of these advertisements will be produced and speak for themselves.

INTERROGATORY NO. 19: State the basis for _____'s Second Affirmative Defense.

ANSWER: The basis for _____'s Second Affirmative Defense is a statement of the law, which speaks for itself.

INTERROGATORY NO.20: State the basis for _____'s Third Affirmative Defense.

ANSWER: _____ specifically requested that the steps be installed parallel to his home, as opposed to a perpendicular installation. Alternatively, _____ approved of the steps being installed parallel to his home. _____ failed to keep a proper look-out and failed to use reasonable care while moving furniture and boxes up the stairs, into his home.

INTERROGATORY NO.21: State the basis for _____'s Fourth Affirmative Defense.

ANSWER: See _____'s response to Interrogatory No. 20.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 6: All documents relating to the relationship of _____ with any other persons, agents, corporations or partnerships, which deliver or install mobile homes sold by _____, including but not limited to contracts, agreements or arrangements.

RESPONSE: This Defendant objects to this request. This request is ambiguous, vague, overbroad, unduly burdensome, and seeks production of documents which are not relevant and otherwise outside the scope of Rule _____. Subject to this objection, there are no written

contracts, agreements or arrangements showing any "relationship" between _____ and _____ or any other entity that delivers or installs mobile homes. Additionally, without waiving the above objection, _____ will produce copies of the invoice submitted by _____ and the check tendered by _____ for services performed by _____ in the delivery and set-up of the _____ home.

REQUEST NO. 10: The personnel file of the _____'s employee named "_____", referenced in Interrogatory No.9.

RESPONSE: There is no personnel file of _____ maintained by _____.

Respectfully submitted,

Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed, U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to _____, at the following address;

THIS the ____ day of _____, 20____.
