

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

Comes now the Plaintiff, _____ in the above styled cause and desiring the testimony of the Defendant, _____, propound to said Defendant the following interrogatories to be answered pursuant to Rule ____ of the _____ Rules of Civil Procedure, to wit:

- ANSWER:**

- ANSWER:**

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ANSWER:

4. Please state the name and address of each person known to you to have witnessed the accident of that is made the basis of this suit.

ANSWER:

5. List the name and address of each person with whom you have ever discussed this accident, other than your attorney.

ANSWER:

6. Have you discussed this accident with any representative at your insurance company?

ANSWER:

7. List all auto accidents of any nature of which you are aware that _____ has ever been involved in either as a driver or as a passenger including the date, the parties involved, and a description of the accident.

ANSWER:

8. List all moving violations of which you are aware _____ has ever received, including the date, the location, the nature of the violation, and the disposition.

ANSWER:

9. Do you understand these interrogatories are to be answered under oath?

ANSWER:

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____.

Plaintiff