

- (c) The name, address and telephone number of each witness, expert or otherwise who will support each contention or defense; and
 - (d) Identify each document and/or tangible item supporting each contention and/or defense sufficiently enough for the plaintiff to obtain the same by request for production of documents.
- 3. Describe in chronological detail how the incident made the basis of this suit occurred.
- 4. State the name, last known address, and last known telephone number of each person who:
 - (a) Was a witness concerning the incident made the basis of this suit;
 - (b) You, your attorney or someone acting on your behalf has talked to concerning any matter involving the case made the basis of this suit;
 - (c) Has discoverable information concerning that incident made the basis of this suit; and
 - (d) From whom you, your attorney or anyone acting on your behalf has taken a statement from, in any form, whatsoever.
- 5. Prior to the incident made the basis of this suit, state the number of incidents wherein a person has claimed to have suffered an injury, illness or died as a result of the presence of a foreign object in your food products within the past ten years;
 - (a) State the name, last known address, and last known telephone number of each such person who has made such claims.
- 6. Identify all safety standards, codes, regulations and/or rules concerning safety issues with respect to foreign objects in food products sold to consumers sufficiently enough for the plaintiff to obtain the same by a request for production of documents.

7. Describe in detail the policy utilized by you which was in effect during _____ to prevent foreign objects from being in the food products you sold to consumers and the method by which such policy was implemented.

8. State the name, last known address and last known telephone number of each employee or ex-employee who has knowledge concerning the incident made the basis of this suit; state what each person knows concerning the same and state whether such person is still employed by you.

9. Describe in detail how you keep track of incidents of people claiming to be injured, claiming to have suffered an illness, and/or who have died as a result of foreign objects in your food products;

(a) State the name, last known address and last known telephone number of the person(s) responsible for tracking said incidents in _____;

(b) Give a description of all documents which would describe incidents wherein persons claimed injury, claimed to have suffered an illness and/or as a result of a foreign in your food products including in your answer where such documents are kept, how such documents are kept, and your record retention policy. Identify these documents sufficiently enough so the plaintiff can obtain the same through a request for production of documents.

10. State whether you are required to notify any governmental entity when a person claims to have suffered an illness, sustained an injury and/or dies as a result of a foreign object in one of your food products;

- (a) State the name of the governmental entity that you are required to notify in the event a person claims to have suffered an injury as a result of a foreign in any of your food products;
- (b) Have you ever notified a governmental entity of any incident wherein any person claimed to have suffered injury, illness, and/or died as a result of a foreign in any of your food products? If so, then please state;
- (c) The name of the governmental entity(ies);
- (d) Identify all documents and tangible items disseminated to said governmental entities sufficiently enough for the plaintiff to obtain same by a request for production of documents.

11. With regard to any statement, remark, comment, conversation and/or communication concerning any matter made the basis of this suit, please state:

- (a) The person making **EACH** statement, etc.;
- (b) The date **EACH** statement, etc., was made;
- (c) State the person to whom **EACH** statement was made to; and
- (d) State all persons present when **EACH** statement, etc. was made.
- (e) Identify all documents and tangible items concerning **EACH** statement, etc., sufficiently enough so the plaintiff can obtain the same through a request for production of documents

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____.

PLEASE SERVE THE INTERROGATORIES WITH THE COMPLAINT