

1 IN THE _____ COURT OF _____ COUNTY
2 STATE OF _____

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NO. _____

Petitioner/Plaintiff,
Vs.
Respondent/Defendant

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

COMES NOW the Plaintiff_____, by counsel, and propound to the Defendant, _____, the following Plaintiff's First Set Of Interrogatories To Defendant, pursuant to: _____, to wit:

INTERROGATORY NO. 1: Please state your full name, any former names, your social security number, date and place of birth, your present home address and any former home addresses for the preceding ten (10) years, the name and address of each of your employers for the preceding ten (10) years until the present, your present driver's license number and the State where issued including any other driver's license held by you for the preceding ten (10) years.

INTERROGATORY NO. 2: Please state whether or not you had any automobile insurance or any other kind of insurance in force and effect on the _____ day of _____, 20____, and if so please state the name, address and telephone number of your insurance company or its local agent, the date the insurance policy or policies were issued, the types of coverage provided, the dollar amounts of the limits of liability, any limitations or exclusions

1 from coverage, and the name, address and telephone number of any other named insureds and/or
2 permissive insureds.

3 INTERROGATORY NO. 3: Please describe in detail your driving history for the
4 preceding ten (10) years until the present, including but not limited to any and all citations
5 and/or warnings issued or given for any moving violation, speeding, reckless driving, driving
6 under the influence, open container, or any other similar citations and/or warnings, and, for each
7 such citation and/or warning, state the time, date and place where the citation and/or warning
8 was issued or given, the name, address and telephone number of the authority or authorities
9 issuing the citation and/or warning, the name, address and telephone number of the court which
10 adjudicated the citation and/or warning including the docket or case number, and state the final
11 disposition and/or sentence entered.
12

13 INTERROGATORY NO. 4: Please state your whereabouts for the twenty-four (24) hour
14 period preceding the accident alleged in this lawsuit. Your response should include the addresses
15 of the places or locations you were at, your purpose or reasons for being in said places, the times
16 during which you were at said places or locations, and the names, addresses and telephone
17 numbers of at least one (1) person whom can verify your presence in each place or location you
18 list in response to this Interrogatory.
19

20 INTERROGATORY NO. 5: Please describe in detail the events, transactions or
21 occurrences happening for the three (3) minute period immediately preceding the point of impact
22 in the accident alleged in this lawsuit. Your response should include, but is not limited to, your
23 actions, reactions, thoughts and sense impressions during the operation of your automobile,
24 including but not limited to, your speed, the lane in which you were traveling, the road and
25 weather conditions, whether any road signs or signals were present and within your eyesight or
26 the immediate vicinity and what such signs said or signals meant, whether you were smoking a
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1 cigarette, listening to the radio, talking on a cellular telephone, engaged in any conversation with
2 any guest passengers, and/or any other similar act, instance or process or omission thereof.

3 INTERROGATORY NO. 6: Describe in detail, and in your own words, exactly how you
4 contend the accident happened.

5 INTERROGATORY NO. 7: Please describe in detail the events, transactions or
6 occurrences happening for the twenty-four (24) hour period immediately following the accident
7 alleged in this lawsuit. Your response should include your whereabouts for the twenty-four (24)
8 hour period following the accident alleged in this lawsuit, the addresses of the places or locations
9 you were at, your purpose or reasons for being in said places, the times during which you were
10 at said places or locations, and the names, addresses and telephone numbers of at least one (1)
11 person whom can verify your presence in each place or location you list in response to this
12 Interrogatory.
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14 INTERROGATORY NO. 8: Do you allege any affirmative defenses to the Complaint filed by
15 Plaintiff(s). If so, please state each and every fact and/or circumstance which forms the basis of
16 the affirmative defense, state the names, addresses and telephone numbers of each person who
17 has knowledge or information of such facts and/or circumstances, and describe in detail any and
18 all documents which contain any information which references and/or relates to said
19 facts/circumstances and/or persons you identify in response to this Interrogatory.
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21 INTERROGATORY NO. 9: For each allegation of Plaintiff's Complaint which you
22 deny, in whole or in part, please state each and every fact and/or circumstance which forms the
23 basis of the denial, state the names, addresses and telephone numbers of each person who has
24 knowledge or information of such facts/circumstances, and describe in detail any and all
25 documents which contain any information which references and/or relates to said
26 facts/circumstances and/or persons you identify in response to this Interrogatory.
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1 INTERROGATORY NO. 10: Have you, or anyone acting on your behalf, including your
2 attorneys, insurance representatives, investigators, or adjusters obtained or received any written
3 or recorded statements from any person or persons claiming to have witnessed the accident
4 alleged in this lawsuit? If so, please state the name, address and telephone number of each
5 person making the statement, the date and place the statement was made, the substance of the
6 statement, and the name, address and telephone number of the person or persons who took the
7 statement.
8

9 INTERROGATORY NO. 11: Have you, or anyone acting on your behalf, including your
10 attorneys, insurance representatives, investigators, or adjusters obtained or received any written
11 or recorded statements from any person or persons claiming to have personal knowledge or
12 information concerning or relating to any issues of liability and/or damages alleged or raised in
13 this lawsuit? If so, please state the name, address and telephone number of each person making
14 the statement, the date and place the statement was made, the substance of the statement, and the
15 name, address and telephone number of the person or persons who took the statement.
16

17 INTERROGATORY NO. 12: Have you, or anyone acting on your behalf, including your
18 attorneys, insurance representatives, investigators, or adjusters obtained or received any written
19 or recorded statements from the Plaintiff(s) in this lawsuit? If so, please state the name, address
20 and telephone number of each person making the statement, the date and place the statement was
21 made, the substance of the statement, and the name, address and telephone number of the person
22 or persons who took the statement.
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24 INTERROGATORY NO. 13: Do you intend to call any person who is expected to testify
25 as an expert witness at trial in this lawsuit? If so, for each such expert witness, please the
26 following:

27 (1) The name, address and telephone number of the expert;
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- 1 (2) The professional and academic qualifications and/or credentials of the expert;
- 2 (3) List any and all articles, books, papers, treatises, studies, and any other similar
- 3 materials authored and/or published by the expert individually or which the
- 4 expert substantially contributed;
- 5 (4) Describe precisely and in detail the expert's field of the expertise;
- 6 (5) List each lawsuit or legal proceeding the expert has testified in for the preceding
- 7 ten (10) years until the present, including the name the parties, the style of the
- 8 action, the court and docket number, and whether such testimony was on behalf
- 9 of the plaintiff or defendant;
- 10 (6) State the amounts and/or rate of compensation the expert will charge for
- 11 providing testimony and information in this lawsuit.
- 12 (7) State the substance of the expert's opinion in this case;
- 13 (8) State the facts and data underlying the expert's opinion in this case; and
- 14 (9) Describe in detail any and all materials, objects or things used or considered by
- 15 the expert in this lawsuit.
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18 INTERROGATORY NO. 14: Please give the name, address, telephone number and field

19 of expertise for any and all experts you have consulted and/or retained. Also, include the

20 following information for each expert:

- 21 (a) A complete statement of all opinion(s) to be expressed and the basis and reasons
- 22 for such opinion(s) along with the data or other information considered by the
- 23 expert(s) in forming the opinion(s).
- 24 (b) Please list any exhibits to be used as a summary of or support of the expert(s)
- 25 opinion(s).
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- 1 (c) Please state the expert(s) qualifications including a list of all publications
2 authored by the expert within the proceeding ten (10) years.
- 3 (d) Please state the amount of compensation to be paid for the expert(s) study and
4 testimony.
- 5 (e) Please provide a list of any other case(s) in which the expert testified as an expert
6 at trial or by deposition within the preceding four (4) years, and set out the names
7 of the attorneys for all parties as well as the name of the attorney with whom the
8 expert was employed.
- 9 (f) Please state whether or not the expert(s) have testified in the Federal Courts of
10 _____ within the last ten (10) years.
- 11 (g) Please set out whether the expert(s) employment in either consultations,
12 depositions, or trial testimonies within the last three (3) years were for the
13 Plaintiff or Defendant. Please, set out the percentage for either the Plaintiff or
14 Defendant during this period.

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17 INTERROGATORY NO. 15: Did you or anyone acting on your behalf make any
18 investigation, analysis, tests, inspections, or measurements with regard to the accident alleged in
19 this case, including accident reconstruction? If so, please state:

- 20 (a) The name, address, and telephone number of each person who made any such
21 investigation, analysis, test, inspection, or measurement;
- 22 (b) The date on which each investigation, analysis, test, inspection, or measurement
23 was made; and
- 24 (c) The name, address, and telephone number of the person now having custody of
25 each and every written report made concerning each investigation, analysis, test,
26 inspection, or measurement.
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1 INTERROGATORY NO. 16: Please list the name, address, telephone number of any
2 persons that took videos or made audio tapes, and describe any video or audio tapes taken of the
3 Plaintiff(s). Please supplement this Interrogatory timely even if the video is taken near the time
4 of trial.

5 INTERROGATORY NO. 17: Do you allege any counter-claim(s) against the
6 Plaintiff(s)? If so, please state the following:
7

8 (1) State each and every fact which forms the basis of said counter-claim(s); and

9 (2) State the name, address and telephone number of each person having knowledge
10 or information of the facts you state in response to subpart (a) of this
11 Interrogatory.

12 INTERROGATORY NO. 18: Do you allege that the accident was caused by any
13 negligence on the part of Plaintiff(s)? If so, please state the following:
14

15 (1) State each and every fact which forms the basis of the allegation;

16 (2) State the name, address and telephone number of each person having knowledge
17 or information of the facts you state in response to subpart (a) of this
18 Interrogatory;

19 (3) Describe in detail each and every duty you contend Plaintiff owed to
20 Defendant(s);

21 (4) Describe in detail each and every act, instance or process by which you contend
22 Plaintiff(s) breached any duty you describe in response to subpart (c) of this
23 Interrogatory;

24 (5) Describe in detail each and every theory which you intend to rely upon to show
25 that the alleged negligence of Plaintiff(s) was a proximate cause of the accident;
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- 1 (6) Describe in detail each and every element and type of damages you allege that
2 you suffered or sustained as a proximate result of the alleged negligence of
3 Plaintiff(s);
- 4 (7) Please identify every physician, surgeon, osteopath, psychiatrist, psychologist,
5 counselor, therapist, hospital, or other medical practitioner or specialist who
6 treated and/or examined you, or with whom you sought advise or conferred for
7 five (5) years prior to the accident, specifying the dates of treatment, examination,
8 or conference, and the precise condition or symptoms treated, and further identify
9 any hospitalization of plaintiff at any time in the past, specifying the dates of
10 confinement and the precise condition or treatment or symptoms treated;
- 11 (8) Please list any and all physicians who have treated you after the alleged date of
12 the injury in this case, listing also the approximate dates such physicians were
13 seen by you, the office address of each such physician, and a general description
14 of the reason or illness or condition for which you saw such physicians and each
15 of them, and attach hereto all medical reports prepared by the doctors in your
16 possession or in the possession of your attorney;
- 17 (9) Please state whether you have ever had, made, claimed, or sued upon any claim
18 for personal injuries or damages to your person, or bodily injuries whatsoever,
19 against any other person, firm, or corporation, other than the workers'
20 compensation claim at any time in your life both prior to the date of the alleged
21 accident in this case, and also after the said date; if the answer to this
22 interrogatory is in the affirmative, please list the date it was filed, the court in
23 which it was filed, the style of the case, a general description of the incident out
24 of which such claim was made, a general description of any such bodily injuries
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1 or personal damages, the approximate date of the accident out of which such
2 claim arose, and the amount of recovery by you, if any;

3 INTERROGATORY NO. 19: If Defendant(s) has ever been convicted of a crime or
4 misdemeanor other than any citations or warnings stated in response to Interrogatory No. 3, for
5 each such person and conviction, state:
6

7 (1) The specific crime(s) or misdemeanor(s) of which such person was convicted;

8 (2) The date(s) of each such conviction; and

9 (3) The court(s) in which such person was convicted.

10 INTERROGATORY NO. 20: If any books, documents or other tangible things exist
11 which contain discoverable matter or which you may utilize as an exhibit on for other reasons
12 during any deposition of any witness, please identify such documents or items, please state the
13 name, address and telephone number of the person or persons who have custody of such books,
14 documents or other tangible things.
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16 INTERROGATORY NO. 21: If any of your responses to any of these interrogatories
17 indicate that discovery is ongoing or that your investigation is not complete or is continuing,
18 please give all of the information that you, your attorneys, investigators, and/or experts have at
19 this time which is responsive to each interrogatory. Have you done this in response to each
20 interrogatory?

21 INTERROGATORY NO. 22: Have you ever been a party to any legal action, legal
22 proceeding, or lawsuit? If so please state the following:

23 (a) Describe in detail any and all such legal actions, legal proceedings or lawsuit.

24 Your answer should include the name of the court, the identity of the parties, the
25 nature of the proceeding, and its present disposition;
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1 (b) Identify all persons having personal knowledge or information relating to or
2 referencing any matter set forth in your response to subpart (a) of this
3 Interrogatory; and

4 (c) Identify all documents containing any information relating to or referencing any
5 matter set forth in your response to subpart (a) of this Interrogatory.
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7 INTERROGATORY NO. 23: Have you ever been involved either as a driver, passenger
8 or pedestrian in an automobile accident? If so, please state the following:

9 (1) State the name, address and telephone number of each person involved;

10 (2) The date and place of the accident;

11 (3) State who was at fault or the cause of the accident; and

12 (4) State whether or not any person involved was issued a citation or warning, and if
13 so, give a brief description of said citation or warning.
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15 INTERROGATORY NO. 24: Identify each person providing the answer or response to
16 each of these Interrogatories and sub-parts, and any and all persons providing any information
17 used by you in answering or responding to these Interrogatories and sub- parts. Your response
18 should include the names, addresses and telephone numbers of each such person.

19 INTERROGATORY NO. 25: If you do not have any automobile insurance or other
20 liability insurance coverage or the same is insufficient to compensate Plaintiff(s) for the full
21 amount of their claims of damages in the least amount of \$_____ alleged in this
22 lawsuit, then please state the following:

23 (1) All documents and things consisting of any tax returns, including corporate,
24 individual and joint-individual, prepared by you or your agents/employees, for
25 the Defendant(s) for the preceding five (5) years.
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1 (2) All documents and things consisting of any financial statements, corporate and
2 individual and joint-individual, prepared by you or your agents/employees, for
3 the Defendant(s) for the preceding five (5) years.

4 (3) All documents and things consisting of any accountings, books, ledgers, records,
5 receipts and other tangible things relating to or referencing the financial
6 condition, including assets and liabilities, transfers of tangible and intangible
7 assets and/or property, of For the Defendant(s) for the preceding five (5) years.

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9 (4) All other documents and things consisting of notes, correspondence, memoranda
10 and other similar documents and tangible things prepared or created by you or
11 your agent/employees relating to or referencing For the Defendant(s) for the
12 preceding five (5) years.

13
14 (5) If you object to any disclosure stated or fairly inferred by the preceding subparts
15 upon any grounds of any privilege or legal doctrine, please provide a brief
16 description of each book, record, document, or other tangible or intangible thing
17 by item and category which you contend is privileged and/or is otherwise subject
18 to non-disclosure.

19 INTERROGATORY NO. 26: Do you now, or have you ever worn glasses, contact
20 lenses, or suffered from any disease affecting or impairing your vision, or you ever undergone
21 any type of surgical procedure or medical treatment on your eyes or vision? If so, please state
22 the name, address and telephone number of the optometrist, doctor, or other professional who
23 diagnosed and treated the disease or impairment of vision, and the date and places of such
24 diagnosis and treatment.

25
26 INTERROGATORY NO. 27: Do you now, or have you ever had any physical or mental
27 disabilities, impairments or incapacities? If so, please describe in detail any such disabilities,
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1 impairment or incapacities, the diagnosis and treatment you have received for the same, and the
2 name, address and telephone number of the doctors or other professionals who have diagnosed
3 or treated your disabilities or impairments.

4 INTERROGATORY NO. 28: Please list in detail any and all prescription drugs or
5 medications you have been prescribed and/or consumed for the last five (5) years until the
6 present, and state the names, addresses and telephone number of all doctors or other
7 professionals who prescribed said prescription drugs or medications to you.
8

9 Respectfully submitted,

10 Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

15 **CERTIFICATE OF SERVICE**

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

21 THIS the ____ day of _____, 20____.

23 _____
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