

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

INTERROGATORIES AND REQUESTS FOR PRODUCTION

Plaintiff requests that the Defendant, _____, answer the following interrogatories:

DEFINITIONS

1. The term Adocuments@, means: all writings of any kind, including the originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and whether printed, recorded, created or reproduced by any mechanical means or process, or written or produced by hand, including, but not limited to: agreements; contracts; drafts of agreements or contracts; written material referencing oral agreements or contracts; confirmatory memoranda; letters of intent; orders; purchase orders; communications; messages; correspondence; personal calendars (whether written electronically or computerized); letters; postcards; telegrams; teletypes; telefax; mailgrams; tape recordings; memoranda; diaries (whether written, electronic or computerized); summaries; notes or other typed or written records; files; intra-office and interoffice memoranda and communications;

personal memoranda; photographic slides; pictures; motion picture films; photographic film; microfilm; microfiche; newspapers; magazines; charts; graphs; drawings; bookkeeping entries; account summaries or statements; financial statements; balance sheets; invoices; bills; orders; receipts; bank record of all types; notes of interviews; statements of witnesses; findings of investigations; reports of experts who are expected to be called to trial; materials furnished to experts expected to be called to trial, cassettes; micro cassettes; computer discs; pamphlets; bulletins; posters; blueprints; drawings; recommendations; safety books; safety manuals; written or printed warnings; test results; opinions or conclusions from test results or investigations; and letters.

2. AIdentify@, when referring to a document request, means that the following information be supplied:

- a.) A description of the document;
- b.) The date of the document;
- c.) The name or names of any individual who may have authored the document or provided information for the document;
- d.) The name or names of any individual to whom the document was sent;
- e.) A general description of the subject matter of the document; and
- f.) The name or names of any person who sent the document.

3. AIdentify@, when using reference to a person or company or entity, requests that the following information be supplied:

- a.) The correct name and address of that person or entity;
- b.) The correct name and address of that person=s employer and job title if reference is made to that person;

- c.) If the information requested contains the name of a person that is no longer employed or associated with Defendant then Defendant or its attorneys should supply not only the correct name and last known address of that person but that person=s date of birth, social security number and last known employer; and
- d.) If the interrogatory requests that the Defendant Aidentify@ a member, then provide the correct name, address, telephone number, social security number and date of birth of that member.

INSTRUCTIONS

4. Wherever information is requested, the request should be deemed to include information available to this Defendant, its past and present insurance carrier or carriers, its attorneys and all officers, agents and/or employees of this Defendant.

5. Should this Defendant deem any documents to be privileged, Defendant shall list such documentation in the manner above indicated, and in addition to supplying the above-noted information concerning such documents, Defendant shall indicate what privilege is claimed and shall briefly state the ground on which the claim of privilege rests, in order that the Plaintiff may have the factual basis to determine whether or not such documents are, in fact, privileged.

6. Produce copies of any accident reports completed at any time regarding the injury which is the subject of this lawsuit.

RESPONSE:

7. Produce copies of any photographs of the accident scene taken by or on behalf of this Defendant.

RESPONSE:

8. Produce a complete list of all employees of this Defendant who worked on the day of the accident which is the basis of this lawsuit, together with a statement as to each persons position at that time, whether the person is still employed by this Defendant, and each persons last known home address and telephone number.

RESPONSE:

9. Produce a copy of any statement taken by or on behalf of this Defendant from the Plaintiff at any time.

RESPONSE:

10. List the name, address, and telephone number of each witness to the accident which is the basis of this lawsuit, together with a statement as to what each witness can testify to.

RESPONSE:

11. Explain in detail the nature of the work being performed on the premises on the date of the accident which is the basis of this lawsuit.

RESPONSE:

12. Produce copies of all work contracts, invoices, agreements, or

other documents in any way related to the work being performed on the Defendant's premises on the date of the accident which is the basis of this lawsuit.

RESPONSE:

13. Produce copies of any statements taken from any person regarding the accident which is the basis of this lawsuit.

RESPONSE:

14. Identify what substance was on the floor at the time the Plaintiff fell.

RESPONSE:

15. Explain in detail what measures were taken by this Defendant to advise patrons of the presence of water or some other slippery substance on the floor of the premises.

RESPONSE:

16. Identify the person/persons who were responsible for inspecting the area where the Plaintiff fell at the time of the Plaintiffs injury.

RESPONSE:

17. Identify all expert witnesses which this Defendant has employed

regarding the accident which is the basis of this lawsuit as well as any experts this Defendant may call to testify at trial, together with a statement of such expert's qualifications and a summary of the expected testimony from such experts.

RESPONSE:

18. Identify all persons which this Defendant may call to testify at trial, together with a statement of the anticipated testimony of each witness.

RESPONSE:

19. Produce to the Plaintiff copies of any and all documents, photographs, memoranda, invoices, statements, or other documentary evidence in any way related to the accident which is the basis of this lawsuit which has not been produced pursuant to other requests herein.

RESPONSE:

20. Produce to the Plaintiff copies of any and all exhibits and/or visual aids which this Defendant may utilize at trial.

RESPONSE:

21. State when the construction/renovation work was commenced and when it was completed. In addition, list all contractors and sub-contractors involved in such construction/renovation, including the name of

the contractor, the address, the telephone number, and a statement of what work each contractor performed.

RESPONSE:

22. Identify each and every person, employee, patron, or otherwise who reported any form of injury between the commencement date and the completion date of the construction/renovation to the premises, including the person's name, the date of the injury, the nature of the injury, the person's address, telephone number, and purpose for being on the premises (employee, patron, etc.).

RESPONSE:

23. Identify the name and position of the person responding to these Interrogatories and Request for production.

RESPONSE:

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____.
