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[REDACTED]

[REDACTED] an individual
Plaintiff,

vs.

[REDACTED] and DOES 1-10,
inclusive,
Defendants.

CASE NO.: [REDACTED]

**PLAINTIFF'S SPECIAL
INTERROGATORIES – FIRST SET
TO [REDACTED]**

Judge: [REDACTED]
Assigned for All Purposes to
Department: [REDACTED]

Date Action Filed: [REDACTED]
Trial Date: [REDACTED]

Attorneys for Plaintiff [REDACTED]

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF [REDACTED]

PROPOUNDING PARTY: [REDACTED]
RESPONDING PARTY: [REDACTED]
SET NO.: ONE

Pursuant to Section §2030.010, 2030.020, and 2030.030 of the Code of Civil Procedure, plaintiff,
[REDACTED] ("PLAINTIFF" OR "PROPOUNDING PARTY") hereby request that

1 [REDACTED] (“DEFENDANT” OR “RESPONDING PARTY” answer the following
2 special interrogatories under oath within (30) days of service.

3 *California Code of Civil Procedure* section 2030.220 required that each answer *be as complete*
4 *and straightforward as the information reasonably available to the responding party permits* and that
5 the RESPONDING PARTY *make a reasonable and good faith effort to obtain the information by inquiry*
6 *t other natural persons or organizations.*

7 In answering these Special Interrogatories, Plaintiff is required to furnish all information that is
8 available to Plaintiff including information in the possession of Plaintiff’s attorneys, investigators o
9 anyone employed on Plaintiff’s behalf or acting on Plaintiff’s behalf, and not merely such information
10 known of Plaintiff’s own personal knowledge.

11 In the event that Plaintiff cannot answer any interrogatory in full, after exercising due diligence
12 to secure the information to do so, so state and answer to the extent possible, specifying the inability to
13 answer the remainder and stating whatever information or knowledge Plaintiff does have concerning a
14 unanswered portion.

15 **DEFINITIONS**

16 1. The term [REDACTED] “YOU” or “YOUR” means and refers to Defendant/Responding
17 party [REDACTED], acting by and through her agents, officers, employees, servants,
18 lawyers, accountants and insurance companies.

19 2. Terms not defined in these Special Interrogatories shall have their ordinary AND usual
20 meanings.

21 3. The term “COMPLAINT” shall refer to the complaint filed by PLAINTIFF against
22 DEFENDANT on [REDACTED].

23 4. The term “PERSON” or “PERSONS” includes a natural person, firm, association,
24 organization, partnership, business, sole proprietorship, trust, limited liability company, corporation or
25 public entity.

26 5. The term “DESCRIBE” when used in a request to characterize an event, act, or
27 occurrence, shall mean that the Responding Party will provide the following information:

28 a. A concise description of the events, acts, or occurrences including, but not limited to,

1 the date of such events, acts or occurrences;

- 2 b. The name, employer, position, address, telephone number and email address of each
3 **PERSON** who was involved in, or with knowledge of, each described event, act or
4 occurrence;
- 5 c. **IDENTIFY** all **DOCUMENTS** evidencing the facts described.

6 6. For the purpose of this set of requests, the term “**DOCUMENT**” means and includes all
7 writings as defined by Evidence Code Section 250 and includes all forms of communication or
8 representation within the possession, custody, control, or reasonably available to responding party,
9 including available to responding party pursuant to any rights it has. **DOCUMENTS** includes, but is
10 not limited to, drafts, final version, original, master, any non-identical copy, whether different from the
11 original because of alterations, interlineations, notes, comments, or other material contained thereon or
12 attached thereto, reports, agreements, contracts, communications, correspondence, letters, faxes, emails,
13 charts, graphs, medical records, reports, files, notes plans, photographs, statements, videotapes, records
14 and any other retrievable data, whether recorded in hard copy, electronically, or otherwise.
15 **DOCUMENTS** withheld from production on the grounds of privileged must be identified in a privilege
16 log.

17 7. The term “**IDENTIFY**” refers to name(s), address(es) (including the city, state, and zip
18 code), phone number(s), and e-mail address(es).

19 8. The term “**IDENTIFY**” when used in a request to characterize a **DOCUMENT** shall
20 mean that the Responding Party will provide the following information:

- 21 a. The date of the **DOCUMENT**;
- 22 b. The title of the **DOCUMENT**;
- 23 c. **IDENTIFY** the author of the **DOCUMENT**;
- 24 d. **IDENTIFY** each **PERSON** that has custody of the **DOCUMENT**;
- 25 e. A brief description of the **DOCUMENT**.
- 26
- 27
- 28

1 **SPECIAL INTERROGATORIES NO. 6:**

2 IDENTIFY the [REDACTED]
3 in the [REDACTED].

4 **SPECIAL INTERROGATORIES NO. 7:**

5 IDENTIFY the [REDACTED] involved [REDACTED] at the time of the
6 [REDACTED]

7 **SPECIAL INTERROGATORIES NO. 8:**

8 State whether YOU [REDACTED] involved in the
9 INCIDENT.

10 **SPECIAL INTERROGATORIES NO. 9:**

11 State the [REDACTED] YOU had [REDACTED] in the [REDACTED] immediately
12 preceding the INCIDENT.

13 **SPECIAL INTERROGATORIES NO. 10:**

14 State whether there was any other [REDACTED] at the time of the INCIDENT.

15 **SPECIAL INTERROGATORIES NO. 11:**

16 If there was any other [REDACTED] at the time of the INCIDENT, IDENTIFY
17 [REDACTED]

18 **SPECIAL INTERROGATORIES NO. 12:**

19 State the [REDACTED] of the [REDACTED] at the time of the INCIDENT.

20 **SPECIAL INTERROGATORIES NO. 13:**

21 In which [REDACTED] were YOU [REDACTED] when the INCIDENT occurred on
22 [REDACTED]

23 **SPECIAL INTERROGATORIES NO. 14:**

24 State the [REDACTED] at the time of the INCIDENT.

25 **SPECIAL INTERROGATORIES NO. 15:**

1 State the [REDACTED] involved in the INCIDENT at the time of
2 [REDACTED]

3 **SPECIAL INTERROGATORIES NO. 16:**

4 State the [REDACTED] on which [REDACTED] was [REDACTED] immediately prior to
5 the INCIDENT.

6 **SPECIAL INTERROGATORIES NO. 17:**

7 State the amount of time [REDACTED]
8 involved in the INCIDENT and [REDACTED].

9 **SPECIAL INTERROGATORIES NO. 18:**

10 State when and how YOU became aware [REDACTED]
11 of the [REDACTED] [REDACTED] by YOU [REDACTED].

12 **SPECIAL INTERROGATORIES NO. 19:**

13 Did YOU [REDACTED] immediately before the INCIDENT?
14

15 **SPECIAL INTERROGATORIES NO. 20:**

16 If YOU applied [REDACTED] immediately before the INCIDENT, state the
17 [REDACTED]
18

19 **SPECIAL INTERROGATORIES NO. 21:**

20 State how YOU [REDACTED] resulting the INCIDENT took place.

21 **SPECIAL INTERROGATORIES NO. 22:**

22 Please describe every fact upon which YOU rely as a basis for YOUR contention in Paragraph 3 of
23 YOUR ANSWER that “[REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED].”

28 **SPECIAL INTERROGATORIES NO. 23:**

1 State whether the [REDACTED]
2 where the INCIDENT occurred, was [REDACTED].

3 **SPECIAL INTERROGATORIES NO. 24:**

4 If the [REDACTED], where the
5 INCIDENT occurred, was [REDACTED], please state the [REDACTED] and
6 the [REDACTED] immediately prior to the [REDACTED] entered [REDACTED].
7

8 **SPECIAL INTERROGATORIES NO. 25:**

9 State whether the aforesaid [REDACTED] where the INCIDENT occurred [REDACTED],
10 and if it [REDACTED], state the [REDACTED] and whether YOU came to [REDACTED]
11 [REDACTED] prior to [REDACTED] [REDACTED].

12 **SPECIAL INTERROGATORIES NO. 26:**

13 State whether YOU [REDACTED] in the INCIDENT that where
14 [REDACTED] prior to the subject INCIDENT.
15

16 **SPECIAL INTERROGATORIES NO. 27:**

17 Describe in detail all actions YOU took or attempted [REDACTED].

18 **SPECIAL INTERROGATORIES NO. 28**

19 State the names(s) [REDACTED].

20 **SPECIAL INTERROGATORIES NO. 29:**

21 State whether YOU [REDACTED] at
22 the time of the INCIDENT.
23

24 **SPECIAL INTERROGATORIES NO. 30:**

25 State the name and address of [REDACTED] health care professional
26 who performed [REDACTED] within the last five years and the dates [REDACTED]
27 [REDACTED].

28 **SPECIAL INTERROGATORIES NO. 31:**

1 State whether YOU [REDACTED] before this INCIDENT. If yes, state the name
2 of the [REDACTED].

3 **SPECIAL INTERROGATORIES NO. 32:**

4 State whether YOU [REDACTED] before the INCIDENT. If yes,
5 state [REDACTED].

6 **SPECIAL INTERROGATORIES NO. 32:**

7 **IDENTIFY** each witness who will testify at trial in this case.

8 **SPECIAL INTERROGATORIES NO. 33:**

9 State all jurisdictions that YOU have been [REDACTED], including
10 [REDACTED] date of [REDACTED], state of [REDACTED] and current status of each
11 [REDACTED] including whether the [REDACTED].

12 **SPECIAL INTERROGATORIES NO. 34:**

13 Describe in detail YOUR [REDACTED] the date of the INCIDENT from the t [REDACTED]
14 [REDACTED] of the INCIDENT.

15 **SPECIAL INTERROGATORIES NO. 35:**

16 Were any [REDACTED] made or taken with respect to the INCIDENT either on
17 YOU or [REDACTED], if so, then state: (a) the subject of each [REDACTED]
18 [REDACTED] (b) the purpose of each [REDACTED]; (c) **IDENTIFY** the
19 **PERSON** who conducted each [REDACTED]; (c) the date on which each [REDACTED]
20 [REDACTED] was performed; (d) the findings and results of each [REDACTED]
21 [REDACTED] (e) **IDENTIFY** the **PERSON** having custody of any written report concerning each [REDACTED]
22 [REDACTED] and (f) **IDENTIFY** the **PERSON** who may be able to provide this
23 information in a deposition.

24 Dated: January 29, 2021. [REDACTED]

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF [REDACTED]

I am employed in the County of [REDACTED], State of California. I am over the age of 18 and not a party to the within action; my business address is [REDACTED].
[REDACTED] On [REDACTED], I served the foregoing document described as PLAINTIFF'S RESPONSE TO FIRST SET OF REQUESTS FOR ADMISSION on the interested parties:

[REDACTED]	Attorney for Defendant [REDACTED]
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BY MAIL: I caused such document(s) to be placed in a sealed envelope and delivered by U.S. Mail to the offices of the addressees on the attached Service List following ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at Long Beach, California in the ordinary course of business. I am aware that on motion of the party sewed, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY FACSIMILE: I caused such document(s) to be transmitted by facsimile to the offices of the addressees on the attached Service List following ordinary business practices.

BY PERSONAL SERVICE: I caused such document(s) to be personally served to the addressees on the attached Service List following ordinary business practices.

STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on [REDACTED], at [REDACTED] California.

By: _____
[REDACTED]

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