

Plaintiff  
vs.

Defendant

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE COUNTY  
\* Case No.

\*\*\*\*\*

**INTERROGATORIES**

TO: \_\_\_\_\_, Plaintiff

BY: \_\_\_\_\_ Defendant

**INSTRUCTIONS**

You are requested to answer the following Interrogatories separately, fully, in writing and under oath, in accordance with and as required by the Maryland Rules of Procedure.

(a) These Interrogatories are continuing in character, so as to require you to file Supplementary Answers if you obtain further or different information prior to trial.

(b) Where the name or identity of a person is requested, please state full name, home address and also business address, if known.

(c) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.

(d) Where knowledge or information in your possession is requested, such request includes that of your agents, representatives, and unless privileged, your attorney. When answer is made by a corporate party, state the name, title and address of the person supplying the information and making the affidavit, and the source of the information.

(e) When the propounding party is a corporation, questions as to actions or of conduct by the corporation include the officers, agents, servants and employees of the corporation, and name or otherwise specify the individual.

(f) The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the person mentioned in clause (d) above.

1. State your full name, address, date of birth, marital status and social security number.

2. State all addresses at which you have resided for the past five (5) years and the

dates thereof.

3. Name the eyewitnesses to all or part of the occurrence complained of, and describe the location of each at the time of the occurrence.

4. Name all persons who arrived at the scene within one hour after the occurrence.

5. Name all persons who investigated the cause or circumstances of the occurrence for you.

6. State whether you are aware of any written or oral statement concerning the subject matter of this action made by this party or any agent, representative or employee of this party; if so, state the substance of each such statement, the place and date when that statement was made, and identify the person making the statement, the person to whom it was made, and identify all documents concerning the statement.

7. Name those persons who have given you statements concerning the occurrence, whether written or recorded, signed or unsigned.

8. State in detail the time of day the occurrence took place, the weather conditions at the time of the occurrence, and the lighting conditions at the time of the occurrence.

9. Give a concise statement of the facts as to how you contend that the occurrence took place and include in your answer a description of where you were coming from and where you were going at the time of this occurrence and where exactly you were located at the point of impact.

10. State exactly what you were wearing (the type and color of clothing) at the time of the incident.

11. Give a concise statement of all of the facts in your possession with respect to the speed, position, location, and direction of the Defendant's vehicle during its approach to, at the time of, and immediately after the impact.

12. State whether you consumed any alcoholic beverages within eight (8) hours prior

to said occurrence, the places where such alcoholic beverages were obtained and the nature and amount thereof.

13. State whether you have within your control, or have knowledge of any transcripts of testimony in any proceeding arising out of the occurrence; if so, state the date, the subject matter, the name and business address of the person recording said testimony, the name and address of the person who has present possession of each said transcript of testimony.

14. State with precision the nature and location of bodily injuries suffered by you as a result of the occurrence complained of.

15. State which of your injuries, if any, you contend are permanent.

16. If you have any present complaints on account of injuries received in the occurrence, state in detail the nature of such present complaints.

17. Name all physicians and hospitals which have examined or treated you as the result of the occurrence, and state the dates and nature of such examinations and treatments.

18. If x-rays were taken of you as a result of this occurrence, state when and by whom.

19. Name all physicians and hospitals which have examined or treated you for any substantial injury, disability or illness during the past five (5) years, and state the approximate dates and the nature of such examinations and treatments.

20. If you have ever received any injuries in any occurrence previous to the date of the incident or subsequent to the date of the incident complained of in this case, state the details of the incident or occurrence, including date, place of occurrence, nature of injuries sustained, names of the parties involved and the names of your attending physicians.

21. Identify all persons whom you expect to call as expert witnesses at trial, and for each such expert state the subject matter on which the expert is expected to testify, the substance of the findings and opinions to which the expert is expected to testify and a summary of the

grounds for each opinion; also, attach to your answers copies of all written reports of such expert concerning those findings and opinions.

22. By whom were you employed and what were your duties and rate of compensation at the time of the occurrence? If you claim to have lost time or income from such employment as a result of the injuries sustained in this accident, state precisely the dates of absence from employment and the amount of wages or income lost.

23. If you did not resume your previous employment, state the reason therefore, when you did begin work after the occurrence, the name of your present employer, your wages and the nature of your work.

24. State the names of all your employers for the past five (5) years and the dates and the nature of such employment and reasons for any termination thereof.

25. State the amount reported as earned income in your income tax returns for each of the past three (3) years and the district in which the returns were filed.

26. Give an itemized statement of all items of monetary loss or damage suffered by you (or which you expect to be suffered by you) as a result of the accident complained of, including medical and other expenses, but excluding loss of earnings stated in response to Interrogatory No. 22 above.

27. Identify all persons having or claiming a subrogation interest in the outcome of this litigation and, for each such person, state the alleged dollar value of that subrogation interest.

28. State whether you have entered into any release, settlement or other agreement, formal or informal, whether reduced to writing or not, pursuant to which the liability of any person for any injury or damage arising out of the occurrence has been limited, reduced or released in any manner.

29. Identify all workers' compensation claims which you have filed at any time for any reason, state the date on which each such claim was filed, the reason it was filed, the exact

nature of the injury for which claim was made, identify your employer at the time of such injury, identify all docket numbers or other claim identification numbers related to such claim, and identify the workers' compensation board or commission with which each such claim was filed.

30. Name any person, not heretofore mentioned, having personal knowledge of any facts material to this case.

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Attorney for Defendant

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**REQUEST FOR PRODUCTION OF DOCUMENTS**

TO: \_\_\_\_\_, Plaintiff

FROM: \_\_\_\_\_, Defendant

The Defendant, by her attorney, \_\_\_\_\_, pursuant to Maryland Rules of Civil Procedure 2-401 and 2-422, requests the Plaintiff to produce copies or produce and permit said Defendant and their agents to inspect and copy at the offices of \_\_\_\_\_ and \_\_\_\_\_ thirty (30) days from the date of this letter at 10:00 a.m., each of the documents, not privileged as described herein.

(a) In accordance with Rule 2-422(c), your written response "shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless the request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to a part of an item or category, the part shall be specified.

(b) In accordance with Rule 2-422(d), the document shall be produced "as they are kept in the usual course of business", or you "shall organize and label them to correspond with the categories in the request."

(c) Pursuant to Rule 2-422(a), these requests encompass all items within your "possession, custody or control." Where documents in the possession of a party are requested,

such request includes those documents in the possession of the party's agents, representatives and, unless privileged, his or her attorneys.

(d) Pursuant to Rule 2-401(c), these requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.

(e) If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition set forth the matter deemed ambiguous and the construction used in responding.

### DEFINITIONS

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

(a) In accordance with Rule 1-202(o), the term "person" includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, the state, its agencies or political subdivisions, any court or any other governmental entity.

(b) The terms "you" or "your" include the person(s) to whom these requests are addressed, and all of that person's agents, representatives or attorneys.

(c) In accordance with Rule 2-422(a), the terms "document" or "documents" includes all "writings, drawings, graphs, charts, photographs, recordings, and other data compilations from which information can be obtained, translated, if necessary, by [you] through detection devices into reasonably usable form."

(d) The term "occurrence" means the incident of \_\_\_\_\_, which gave rise to this action.

1. All documents identified in your Answers to Interrogatories of any party.
2. Any and all documents to support any claim of the Plaintiff's of negligence on the part of this Defendant or any other party in connection with the \_\_\_\_\_ incident.

3. All medical records pertaining to treatment rendered by any physician, dentist, hospital or other medical practitioner or facility in connection with injuries claimed to have been suffered by Plaintiff, as a result of the occurrence which is the subject of this litigation.

4. All medical records pertaining to treatment rendered by any physician, dentist, hospital or other medical practitioner or facility in connection with any illness or condition from which the Plaintiff was suffering at the time of the occurrence which is the subject of this litigation.

5. All medical records pertaining to treatment rendered by any physician, dentist, hospital or other medical practitioner or facility within five (5) years prior to or at any time subsequent to the occurrence which is the subject of this litigation.

6. All bills or invoices for medical treatment rendered by any physician, dentist, hospital or other medical practitioner or facility in connection with injuries claimed to have been suffered by the Plaintiff as a result of the occurrence which is the subject of this litigation.

7. Plaintiff's income tax returns, as filed with the Internal Revenue Service, for five (5) years preceding the occurrence which is the subject of this litigation, and for the years subsequent to the occurrence, through to the present date.

8. Statement from the Plaintiff's employers reflecting any time claimed to have been lost from work as a result of the occurrence which is the subject of this litigation.

9. All written reports of each person whom you expect to call as an expert witness at trial.

10. All written or recorded statements of this party, or of any agent, representative or employee of this party, concerning the subject matter of this action.

11. All documents concerning any release, settlement or other agreement, formal or informal, pursuant to which the liability of any person for any injury or damage arising out of the occurrence has been limited, reduced or released in any manner.



12. All insurance policies under which a person carrying on an insurance business might be liable to satisfy all or part of a Judgment that might be entered in this action or reimburse you for payments made to satisfy such a Judgment.

13. All documents which support any and all of the special damages which you claim in this action.

14. All photographs, videotapes or audiotapes, x-rays, diagrams, surveys, or other graphic representations of information concerning the subject matter of this action.

15. All documents reflecting any and all claims made by or on behalf of the Plaintiff within or without the State of Maryland, including but not limited to, correspondence from or on behalf of the Plaintiff addressed to other individuals, corporations, or governmental agencies asserting claims for personal injuries arising from this incident.

16. All codes, standards or other regulations upon which you have relied or intend to rely in connection with this case.

17. All calculations, diagrams, engineering drawings, computer printouts or other data which have been prepared in connection with this case.

18. All models or other physical objects which you have prepared in connection with this case.

19. All documents relating to statements given by this Defendant, her representatives, agents or employees, concerning this incident being electronically recorded, written or oral and later transcribed.

20. All documents relating to the Plaintiff's employment for the period of five (5) years prior to or at any time subsequent to the occurrence which is the subject of this litigation.

21. All reports and/or correspondence prepared by you or on your behalf in connection with any investigation in which you have engaged in this case.

22. All correspondence or other documents received by you in connection with your investigation in this case.

23. All written or recorded statements obtained from any person and/or which describe how the accident in this case occurred.

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Attorney for Defendant

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**CERTIFICATE REGARDING DISCOVERY**

I hereby certify that a copy of *Interrogatories and Request for Production of Documents*  
and this *Certificate of Discovery*, was mailed on this 16<sup>th</sup> day of May, 2007 to:

Laura G. Zois, Esquire  
7310 Ritchie Highway  
Empire Towers, Suite 1001  
Glen Burnie, MD 21061  
Attorney for Plaintiff

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Attorney for Defendant