

11.3 SAMPLE EXHIBIT – EVIDENCE RELIED UPON

Exhibit B

SUPERIOR COURT OF MAJOR
JAMNER COUNTY

GLENNA WASHINGTON,))	
)	No. 7-43-20XX
Plaintiff,))	
v.))	PLAINTIFF WASHINGTON'S FIRST
)	SET OF INTERROGATORIES
MARC PROUST,))	AND REQUEST FOR DOCUMENTS
)	TO DEFENDANT PROUST
Defendant.))	
_____))	

TO: Defendant Marc Proust and his attorney, B. Y. Davis.

In accordance with Rules 26, 33, and 34 of the Civil Rules for Superior Court, please answer the following interrogatories and requests for production under oath separately, fully, in the space provided, adding pages if additional pages are necessary, within twenty (20) days of the date of service upon you.

If any part of the following interrogatories or requests cannot be answered in full, please answer to the extent possible, specifying the reasons for your inability to answer fully and stating whatever information or knowledge you have concerning the unanswered portion.

These interrogatories and requests for production are continuing in nature, and you are requested to provide any information which alters or augments the answers given through supplemental answers. Supplemental answers should be provided within a reasonable time following discovery of the additional information and prior to trial.

MATTERS OF GENERAL APPLICATION AND DEFINITIONS

A. The answer to each interrogatory or request for production shall include such knowledge of the defendant as is within the defendant's custody, possession, or control. Such knowledge includes documents in the defendant's custody, possession, or control, or those documents under common control, the control of predecessors in interest, consultants, accountants, attorneys, or other agents. When facts set forth in answers or portions of answers are supplied upon information and belief rather than upon actual knowledge, the defendant should specifically describe or identify the source or sources of such information and belief. Should the defendant be unable to answer any interrogatory or portion of an interrogatory by either actual knowledge or upon

information and belief, the defendant should describe all efforts to obtain such information.

B. In response to each interrogatory or request for production, if the defendant does not answer the interrogatory or request for production in whole or in part because the defendant is unable to do so, defendant should identify each person the defendant believes has information regarding the subject of such interrogatory.

C. If the defendant contends that the answer to any interrogatory or request for production is privileged in whole or in part, or otherwise objects to any part of any interrogatory or request for production, or maintains that an identified document would be excludable from production to the defendants in discovery regardless of its relevance, defendant should state the reasons for each objection or grounds for exclusion and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

D. For the purpose of these interrogatories and requests for production, the term “document” shall mean any book, pamphlet, periodical, letter, report, memorandum, notation, message, telegram, cable, record, study, working paper, chart, index, tape, correspondence, records of purchase or sale, contracts, agreements, leases, invoices, electronic transcriptions or taping of telephone or personal conversations or conferences, or any and all other written, typed, punched, taped, filmed, or graphic matter, or thing, however produced or reproduced.

E. For the purpose of these interrogatories and for production:

1. The terms “identify” or “identification” when used in reference to an individual person shall mean to state the person’s full name, present address, telephone number, and, if known, a present position and business affiliation.

INTERROGATORY 10(E):

Please attach copies or releases for all medical bills, statements, narrative medical reports, hospital records, medical test results, receipts for prescriptions, written documents, notes and other materials concerning your health, injuries or illnesses during the past ten years which have been suffered by you prior to the incident which is the subject matter of this lawsuit.

ANSWER: Objection. Privileged.

DATE: January 1, 20XX

By: *F. C. Townsend*

Attorney for Plaintiff Washington

F. C. Townsend, Major Bar No. 1241

Townsend & Seebreeze

1600 Nat’l Bank Building

Jamner, Major 96120

Telephone No. (206) 825-6245