V I R G I N I A:

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

vs. \* Case No.

\*

\*

Defendant \*

 ***FIRST SET OF INTERROGATORIES TO THE PLAINTIFF***

TO: Plaintiff

Pursuant to the Rules of the Court, the undersigned propounds the following Interrogatories to be answered separately, under oath and in writing, in accordance with said Rules.

Guidelines for Answers to Interrogatories:

 (a) These Interrogatories are continuing in nature so as to require the filing of supplemental answers and responses without further request should additional information or information inconsistent with the information contained in the answers and responses to these Interrogatories become available to the party or parties to whom these Interrogatories are directed.

(b) Where information or knowledge in the possession of a party is requested, such request includes knowledge in the possession of the party's agent(s), employee(s), next friend(s), guardian(s), representative(s) and, unless privileged, the party's attorney(s).

(c) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the events/incident mentioned or complained of in the pleadings (hereafter “the incident”).

(d) Where the name of a person or entity is requested, state the full name, home address, business address, and office and home telephone numbers.

(e) Where the identity of a document, whether in paper, electronic or other format, is requested, state (i) the date of the document; (ii) the author or identity of the document and addresses, if applicable; (iii) the present location of the document; and (iv) the person having custody of the document.

(f) The pronoun 'you' or 'your' refers to the party(ies) to whom these Interrogatories are addressed, and the persons and/or entities mentioned in clause (b) above. When appropriate, the masculine gender may be considered to be substituted for the feminine gender and vice versa, and the singular may be considered substituted for the plural and vice versa.

(g) When you are asked to disclose facts which support your position, state the source of those facts.

(h) The definitions and instructions contained in this party's First Request of Documents and Things are incorporated herein and made a part hereof.

**INTERROGATORY NO. 1**

Fully identify the individual answering these Interrogatories. If they are answered on behalf of an entity, your answer is to include title, job description, responsibilities and length of employment with this entity, and state whether you are acting as an agent of this party in responding to these Interrogatories.

**Answer:**

**INTERROGATORY NO. 2**

 Identify, in the manner described in paragraph (d) of the Guidelines, each person with knowledge of the facts relevant to the subject matter of this action. Separately, for each person, state a brief description of the information you contend is known by such persons.

**Answer:**

**INTERROGATORY NO. 3**

Identify each person who you expect to call as an expert witness at the hearing or trial of this matter and state the subject matter upon which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, a summary of the grounds for each opinion, and the qualifications and professional background of such expert.

**Answer:**

**INTERROGATORY NO. 4**

If you are aware of any statements, oral or written, made by the party propounding these Interrogatories relating to the incident or to the damages alleged to be caused by the incident, state the date and substance of such, whether such statement is in whole or in part in any documentary form, the name and address of the custodian of such statement, and the identity of the witnesses to such statement.

**Answer:**

**INTERROGATORY NO. 5**

If you have any facts indicating that any party to this lawsuit, or any person whose identity is called for in Interrogatory 1 or 2, or any other person identified as a potential witness at trial has been convicted of a felony or crime of moral turpitude, identify such person, the crime convicted of, and the date of such.

**Answer:**

**INTERROGATORY NO. 6**

If you have any facts to indicate that any party to this action has not been properly identified herein, lacks capacity to be a party or is improperly joined, state those facts.

**Answer:**

**INTERROGATORY NO. 7**

 State with as much detail as you can how you contend the incident happened. Your answer should include the date, time and location of the incident and the events relating thereto in their chronological order.

**Answer:**

**INTERROGATORY NO. 8**

With respect to any affirmative defense asserted in this case, state and identify:

(a) the facts which support such;

(b) the persons with knowledge of any facts concerning such, together with a brief description of the facts you contend to be known by such person; and

(c) the documents and things which contain, relate or refer to facts which prove or disprove that issue.

**Answer:**

**INTERROGATORY NO. 9**

If you suffered/incurred any injuries/damages relating to the incident which is the subject of this litigation then state in detail what those damages/injuries were.

**Answer:**

**INTERROGATORY NO. 10**

If you have any facts that the Plaintiff has not suffered/incurred the damages and/or injuries alleged in this litigation then state those facts.

**Answer:**

**INTERROGATORY NO. 11**

If you or anyone on your behalf has at any time after the incident posted anything on social media referring or relating to the incident or your physical or mental condition after the incident then state the name of the media, when the posting was made and the content of such.

**Answer:**

**INTERROGATORY NO. 12**

With respect to the injuries or ailments you allege you suffered as a result of this incident, state:

a) The nature of the injury or ailment.

b) The extent and nature of any past, present or future disability that you are claiming and the duration of such.

**Answer:**

**INTERROGATORY NO. 13**

If you have received or anticipate receiving any treatment with respect to the injuries allegedly suffered, state:

a) The name and address of each physician or institution where you have been treated or anticipate being treated and attach copies of each and every report, memorandum or other document prepared by such doctors or institutions during the course of your treatment.

b) The dates upon which such treatment was or will be rendered, and in the case of a hospital the dates of entry and discharge therefrom.

c) The treatment, procedure or operation given or to be given by each such physician or administered in each such hospital.

**Answer:**

**INTERROGATORY NO. 14**

Since the date of the incident referred to, have you been treated by or examined by or conferred with or consulted with any other doctor or medical practitioner of any type whatsoever whose name you have not heretofore supplied. If so, state the name and address of such person or persons.

**Answer:**

**INTERROGATORY NO. 15**

State whether prior to or subsequent to the incident in question you have ever been involved in any other incident resulting in personal injury to yourself and, if so, state the date, place and circumstances of the incident, the nature of the injury and the name and address of any physician or hospital by whom you were treated and attach copies of all such reports from such physicians or hospitals.

**Answer:**

**INTERROGATORY NO. 16**

 If you have incurred any medical or hospital bills, set forth each such expense in detail giving the amount, date and person to whom each amount is owed and attach a copy of each such bill and, in addition, set forth any future medical or hospital expenses that you anticipate incurring.

Answer:

**INTERROGATORY NO. 17**

Are you asserting in this case any claim for loss of earnings or income, either past or future? If so, state:

a) The name and address of your employer and supervisor at each employment for the last ten years, giving the dates of employment at each and your occupation with each such employer.

b) The weekly amount of gross income you were being paid on each job.

c) The date you ceased work due to conditions related to this incident.

d) Whether you ever returned to work since the date of the incident; if not, why not? If you did return, state the date that you returned.

e) The total amount of lost income or wages you are claiming, stating first the past lost wages or income and then the future lost wages or income and state in detail how you arrived at each figure.

f) The total amount of work time in hours that you lost from your employment.

g) Your gross income for each year during the three years immediately prior to this incident.

**Answer:**

**INTERROGATORY NO. 18**

Have you sustained or do you anticipate sustaining any additional financial losses as a result of the incident in question other than those covered by the preceding questions? If so, give the nature and amount of each expense and the name and address of the persons to whom the money is owed and attach copies of all documents in your control in support of such expense.

**Answer:**

**INTERROGATORY NO. 19**

As a result of the injury referred to in this lawsuit, do you claim that you have lost or had impaired any social, educational, recreational, athletic, artistic or other activity, skill or quality which you engaged in or had prior to your injury? If so, for each loss or impairment, state:

a) A description of the activity, skill or quality and the nature and extent of the loss or impairment.

b) The names, addresses and occupations of each person who has knowledge of any of the matters referred to in the preceding subsection, and indicate the facts known by each person listed.

**Answer:**

**INTERROGATORY NO. 20**

If in fact you claim that this defendant violated any statute, rule, code, or any other standard of care which in some way contributed to this accident, state precisely what that code, rule, statute or standard of care is and state all of the facts that you are aware of as to how this defendant violated such.

**Answer:**

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*Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_, Defendant*

***CERTIFICATE OF SERVICE***

I hereby certify that a true copy of the foregoing was sent this \_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_ by: \_\_\_\_\_\_\_\_ regular mail, postage pre-paid

\_\_\_\_\_\_\_\_ facsimile

\_\_\_\_\_\_\_\_ electronic mail

\_\_\_\_\_\_\_\_ hand delivery

To:

 *Counsel for Plaintiff*

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Brien A. Roche, Esq.