

PLAINTIFF'S APPROVED MEDICAL
MAL-PRACTICE INTERROGATORIES
TO DEFENDANT (CORPORATION)

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

_____,)
)
Plaintiff,)
) Cause No. _____
vs.)
) Division No. _____
_____,)
)
Defendant.)

PLAINTIFF'S INTERROGATORIES DIRECTED TO DEFENDANT

Comes not plaintiff, by and through his/her attorneys, and submits the following interrogatories to be answered by this defendant as provided by law:

DEFINITION

Whenever in these Interrogatories you are requested to "identify" some person, corporation or other organizations, please provide name, address, and telephone number.

1. State whether or not this defendant is being sued in its full and correct name. If not, state the full and correct name of this defendant.

ANSWER:

2. Please state the name and present business address of each and every individual who supplied information used to answer these interrogatories and identify his, her, or their legal capacity within defendant's corporate administration.

ANSWER:

3. Please state whether or not [individual doctor, nurse, etc.] was this defendant's employee, agent, or servant at [the time and place of the occurrence described in plaintiff's petition], and if not, please state the following:

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- (a) How their services were charged to plaintiff;
- (b) How [individual doctor, nurse, etc.] was paid or reimbursed by this defendant for any of [individual doctor, nurse, etc.] services performed on or provided to plaintiff;
- (c) Whether or not this defendant deducted any social security, income tax, or any other deductions of any kind from [individual doctor, nurse, etc.] remuneration?
- (d) Whether there are or were any written contracts, agreements of employment, or indemnification agreements for such services in existence. If so, in whose custody are they are the present time?

ANSWER:

4. Please state whether or not [individual doctor, nurse, etc.] maintained any type of staff privileges whereby he/she would be allowed to admit patients and render treatment thereto while inpatients of your facilities, and if your answer to this interrogatory is "yes," please state the following:
- (a) The exact nature of staff privileges granted;
 - (b) Whether those privileges were limited to any particular areas of medicine or specialties in medicine;
 - (c) Whether or not those privileges included [e.g., surgical] privileges, and if so, please state the general nature and subject matter of the areas or specialties in which those [e.g., surgical] privileges were granted; and
 - (d) Please describe the manner or method in which staff privileges are granted by defendant to physicians.

ANSWER:

5. State whether or not, following the date of the occurrence mentioned in the petition in this case, a statement, interview, or report, or a stenographic, mechanical, electrical, audio, video, motion picture, photograph or other recording, or transcription thereof, of the plaintiff, or of a statement made by the plaintiff and contemporaneously recorded, has been secured from plaintiff or taken of plaintiff; if so, state the following:
- (a) Date, place, and time taken;

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- (b) Name and address of the person or persons connected with taking it;
- (c) Names and addresses of all persons present at the time it was taken;
- (d) Whether the statement was oral, written, shorthand, recorded, taped, etc.;
- (e) Was it signed?
- (f) Names and addresses of the persons or organizations under whose direction and upon whose behalf it was taken or made;
- (g) Please attach an exact copy of the original of said statement, interview, report, film, or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.

ANSWER:

6. Identify each person by name, address, occupation, place of employment and qualifications to give an opinion, who the defendant expects to call as an expert witness with respect to any aspect of the suit and state the general nature of the subject matter on which the expert is expected to testify, and the expert's hourly deposition fee. [The expert's curriculum vitae may be attached to the interrogatory answers in lieu of stating the qualifications of the expert to give an opinion if such information is available on the expert's curriculum vitae.]

ANSWER:

7. Identify any insurance agreement under which any person carrying an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment, including any excess coverage or umbrella coverage, and with respect to each, please state:
- (a) The type of insurance which gives rise to the interest, including but not limited to whether excess or primary;
 - (b) Limits of coverage;
 - (c) Effective policy period;

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- (d) Whether there exists medical pay coverage in addition to coverage listed in (a) above, and if so, the amount;
- (e) Policy number;
- (f) Identity of all insureds;
- (g) Insurer's identity; and
- (h) Is a reservation of rights being made?
- (i) Attach a complete copy of the declaration page and policy of any insurance agreement identified.

ANSWER:

8. Identify all records the defendant has which pertain to care and treatment of plaintiff (or plaintiff's decedent) including (select appropriate types: charts, ultrasounds, fetal monitoring strips, x-ray films, C.T. scans, M.R.I. scans, PET scans, nuclear scans, EEGs, EKGs, arteriograms, doppler reports/data, photographs, videotapes, molds, microscopic slides, tissue blocks, or _____). With respect to those records, please state:

- (a) Identify who kept the above designated records, where they were kept, and state whether they were kept as part of the standard business practice of the defendant;
 - (i) Were the entries made by the defendant, or the defendant's office personnel, made at or near the time of the facts recorded?
 - (ii) Describe any alterations in the record, or any record additions, subtractions, or changes in entries wherein, the alterations, additions, subtractions, or changes in entries were not made at or near the time of the original facts recorded.
 - (iii) Were any records lost, misplaced, or destroyed, or are any records currently unavailable?

If 8(a) (iii) is answered affirmatively,

1. What record or document?
2. When?
3. Why?
4. By whom?
5. In whose custody was it in at the time?
6. State its contents as nearly as practicable.

ANSWER:

9. State whether you were incorporated any time that this defendant or any of this defendant's agents, servants, or employees rendered any care and treatment to plaintiff, and if so, state with respect to each said incorporation the following:
- (a) The inclusive dates of said corporation;
 - (b) The exact corporate name;
 - (c) The state of incorporation;
 - (d) Any other names under which you or the corporation have done business at any time the corporation or any of its agents, servants, or employees rendered any care and treatment to plaintiff and the dates of said use;
 - (e) The names and addresses of your corporate officers;
 - (f) The name and address of your registered agent;
 - (g) The name and address of your registered office;
 - (h) State your corporate purpose during all periods of your existence; and
 - (i) If during any part of the year ____ [year(s) during which acts of negligence alleged in petition occurred] you were not operating as a corporation as set forth in answers above, state your exact status during that year and the names and addresses of all partners at the time, if applicable.

ANSWER:

10. During the course of this defendant's health care provider relationship with plaintiff, and while acting through this defendant's agents, servants, and/or employees, state the name and address of any health care provider(s) this defendant referred plaintiff to at any time and the date(s) and purpose of said referral.

ANSWER:

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11. State the date this defendant's health care provider relationship with plaintiff ended, including the date this defendant, by its agents, servants, and employees, last had contact with plaintiff (including telephonic or written communication).

ANSWER:

12. With respect to plaintiff's allegation contained in plaintiff's pleadings, state the full name and last known address of each person who:

- (a) Witnessed or claims to have witnessed the event or occurrence wherein plaintiff alleges an act of negligence occurred;
- (b) Was present or claims to have been present at the scene of the event or occurrence immediately before, at the time of, or immediately after the time plaintiff alleges an act of negligence occurred.

ANSWER: