

ANSWER:

3. STATEMENTS

State whether or not, following the date of the occurrence mentioned in the petition in this case, a statement, interview, or report, or stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcription thereof, of the plaintiff or plaintiff's agents, servants or employees, or if a statement made by the plaintiff or plaintiff's agents, servants or employees and contemporaneously recorded, has been secured and, if so, state the following:

- (a) Date, place, and time taken;
- (b) Name and addresses of all 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 the statement, interview, report, film, or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.
- (h) Name and addresses of person from whom a statement was obtained.

ANSWER:

4. PHOTOGRAPHS, ETC.

State whether there exist photographs, videotapes, or movies with respect to the scene of the occurrence mentioned in the petition taken within one year prior to or subsequent to the incident mentioned in plaintiff's petition. If so, state the following:

- (a) Describe each photograph, video or movie;
- (b) State the date each was taken;
- (c) State the name and address of the person taking each such photo, video, or movie;
- (d) State the name, address, employer, insurer and job title of the person presently having control or custody of each photograph, video or movie.

ANSWER:

5. EXPERTS

List and identify:

- (a) Each person this defendant expects to call as an expert witness at trial, stating for each such expert:
 - (i) Name;
 - (ii) Address;
 - (iii) Occupation;
 - (iv) Place of Employment;
 - (v) Qualifications to give an opinion (if such information is available on an expert's curriculum vitae you may attach a copy thereof in lieu of answering this interrogatory subpart);
- (b) With respect to each expert listed, please state the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.
- (c) Identify each non-retained expert witness, including a party, who the plaintiff expects to call at trial who may provide expert witness opinion testimony by providing the expert's name, address and field of expertise. State also any opinions the expert will testify to at trial.

ANSWER:

6. WITNESSES

State the names and addresses of every person known by defendant, defendant's representatives or defendant's attorney to have witnessed the occurrence mentioned in the petition, or who was present at the scene within sixty (60) minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence.

ANSWER:

7. WITNESS STATEMENTS

State whether or not written or recorded statements have been obtained from any persons mentioned in the answers to Interrogatory Number 6 above with regard to the facts or circumstances surrounding the occurrence mentioned in these pleadings. If so, state the following:

- (a) The names, addresses and employers of persons whose statements were obtained;
- (b) Name, address, employer and job title of the person presently having control or custody of each statement.

ANSWER:

8. CRIMINAL RECORD

State whether the defendant has ever been convicted of any felony or misdemeanor (state or federal) or has ever pleaded guilty to an offense arising out of the facts alleged in the petition. If your answer is in the affirmative, please state:

- (a) The date of any such conviction or plea;
- (b) The state where said conviction or plea occurred;
- (c) The offense for which the plaintiff was convicted or pleaded guilty.

ANSWER:

9. VIOLATIONS

State whether Defendant or Defendant's representatives was/were convicted of or pleaded guilty to any violation of a law or ordinance arising out of the condition of the property alleged in plaintiff's petition within 90 days before or after the occurrence in question, and if so, state the charges to which such person was convicted or pled guilty, the name and address of the court where same occurred, the date of final disposition, and the cause number for each such plea or conviction.

ANSWER:

10. INSURANCE

State whether or not any insurance company (including a company with excess or umbrella coverage) has an interest in the outcome of this litigation against defendant. If so, state the following:

- (a) Name of the insurance company;
- (b) Whether the insurance company is a stock company or a mutual company;
- (c) Name of the insured;
- (d) Type (s) of insurance;

- (e) Effective policy dates;
- (f) Policy Number;
- (g) Limits of the policy applicable to the occurrence mentioned in these pleadings;
- (h) Attach a copy of the declaration page or Certificate of Coverage of such policy of insurance to your answers to these Interrogatories.

ANSWER:

11. STATUS OF DEFENDANT

State whether or not Defendant is incorporated; and if so state:

- (a) The date and state of incorporation;
- (b) The exact name of the corporation as it appears in its articles of incorporation;
- (c) Whether or not the corporation is now in good standing and if not, the date on which it was administratively suspended or otherwise dissolved;
- (d) If the corporation forfeited its charter, state the exact time that it forfeited its charter and give the names and addresses of the officers of the corporation;
- (e) If the defendant is not incorporated, state whether or not it is a partnership, and if so, give the names of all partners or if it is a municipal corporation or a political organization, state its exact name and in what state it is organized to do business.

ANSWER:

12. OWNERSHIP INTEREST IN PROPERTY

State whether or not this Defendant was the owner of the property mentioned in Plaintiff's petition, and if so, state:

- (a) The date acquired;
- (b) The name and address from whom acquired;
- (c) If Defendant has sold the property subsequent to the occurrence in question, please give the date that it was sold and the name and address to whom it was sold; and
- (d) If Defendant denies that it was the owner at the time and place of the occurrence in question, please state to the best of Defendant's knowledge, the name and address of the titled owner at the time of said occurrence.

ANSWER:

13. RELATIONSHIP OF DEFENDANT TO OWNER OF PROPERTY

If Defendant was not the owner of said property, state whether or not the Defendant had any relationship with the owner of said property, including management of said property, securing repairs for said property, or obtaining rents for said property and state the nature of said relationship.

ANSWER:

14. MAINTENANCE

State the name and address of the person or entity that was employed to maintain the area wherein the alleged occurrence took place at or near the time of the incident and further state whether or not this person or entity was an employee of Defendant or was a separate person or company hired by Defendant to maintain this area.

ANSWER:

15. REPAIRS PRIOR TO ALLEGED INCIDENT

State if any repairs were made to the (state specific area e.g., aisle, stairway, ect.) described in Plaintiff's petition within one year before said alleged occurrence, and if so, state:

- (a) The date of said repair;
- (b) The name and adress of the person or entity that made the repair;
- (c) When the repairs were made;
- (d) Describe the repairs; and
- (e) State who employed the person or entity that performed said repairs

ANSWER:

16. REPAIRS SUBSEQUENT TO ALLEGED INCIDENT

State whether Defendant know of any person or entity that has made any changes within one year after the occurrence in question to the (state specific area e.g., aisle, stairway, ect.) described in Plaintiff's petition, and if so, state:

- (a) The name and adress of the person or entity making said repairs;
- (b) The date of said repairs;
- (c) The purpose of said repairs; and
- (d) What said repairs consisted of.

ANSWER:

17. WITNESS TO CONDITION OF PROPERTY

State the names addresses and employers of all witnesses to the condition of the premises in the area mentioned in Plaintiff's Petition, within 60 minutes before or after the incident mentioned in Plaintiff's Petition, and if any, state whether or not they are employed by this Defendant presently, and if so state their present job title.

ANSWER:

18. OWNERSHIP INTEREST

State wheter or not this Defendant was the sole owner of the property at the time of the occurrence mentioned herein or, if not the sole owner state:

- (a) What type of ownership interest he/she had in the property;
- (b) If others also had an interest in the property;
- (c) State what type of intereste other person had in the property; and
- (d) State their name, present residence and business address.

ANSWER:

19. PARTNERSHIP STATUS

State wheter or not this Defendant was a member of a partnership whcih was the owner of the property where the occurrence took place, and if so, state:

- (a) The name and address of the partnership;
- (b) State the name and address of each member of the partnership.

ANSWER:

20. LEASEHOLD INTEREST INFORMATION

State wheter or not this Defendant was either the lessor or lessee of the property wherein the Plaintiff alleges his/her accident occurred on the date of the incident set out in Plaintiff's Petition. If so, please identify:

- (a) Whether the Defendant was the lessor or lessee;
- (b) Other parties to the lease;
- (c) The date of any leaseholder or possessory interest acquired in said property; and
- (d) Produce copies of leases relating to the property.

ANSWER:

21. POLICE REPORTS

State whether or not a police report was made pertaining to the alleged incident and if so, state:

- (a) The name and address of the police department;
- (b) The complaint number; and
- (c) The name and address of the investigating officer and if you will do so without a request to produce, attach a copy of the police report.

ANSWER: