

JAMES T. KIRK

Plaintiff

v.

HAN SOLO

Defendant.

IN THE

DISTRICT COURT

OF MARYLAND FOR

MONTGOMERY COUNTY

CASE NO.:

Trial Date:

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**INTERROGATORIES**

**PROPOUNDED PURSUANT TO THE MARYLAND RULES**

TO: James T. Kirk, Plaintiff

BY: Han Solo, Defendant

You are requested to answer the following Interrogatories:

(a) These Interrogatories are continuing in character, so as to require you to file supplementary Answers if you obtain further or different information before 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 possession of a party is requested, such request includes knowledge of the party's agents, representatives and, unless privileged, his attorneys. When answer is made by a corporation, state the name, address and title of the person supplying the information, and making the affidavit, and the source of his information.

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

1. State your full name, any former names or aliases, home address and business address, date of birth, marital status and social security number.

2. Identify each document that you, or your attorney, believe will be admissible into evidence at trial of this civil action pursuant to the Courts and Judicial Proceedings Article 10, Section 104 (Cts. and Jud. Pro. 10-104), or Section 105 (Cts. and Jud. Pro. 10-105), and why you or your attorney, believe it is so admissible.

3. Name the eyewitnesses to all or part of the occurrence, and state the location of each such eyewitness at the time of the occurrence.

4. State the substance of any conversations you have ever had with the defendant in this civil action.

5. Identify by name, address and telephone number all persons who given you “statements” as that term is defined in Rule 2-402(d), concerning this civil action or its subject matter. For each statement, state the date on which it was given and identify the custodian of the statement.

6. State the manner in which you say the accident complained of happened, giving the various speeds, positions, directions and locations of all vehicles involved in the said accident during their approach to, at the time of, and immediately following the happening.

7. State with precision the nature and location of each injury sustained by you as a result of the occurrence and state whether each injury was temporary or is permanent.

8. Name all experts (including hospitals) whom you intend to call at trial with whom you have consulted with respect to either the happening of the accident or the injuries or damages sustained, give the dates of each and every consultation, and attach to your Answers copies of all written reports made to you by those experts (including hospitals) whom you propose to call as witnesses.

9. Itemize all charges, expenses and losses, including incomes, paid or incurred by you, stating to whom paid or owed, and attach to your Answers copies of all bills or estimates relating thereto.

10. In compliance with Rule 2-402(e)(1) name all experts whom you intend to call at trial with whom you have consulted with respect to either the happening of the accident or the injuries or damages sustained, state the subject matter on which the expert is expected to testify and give a summary of the grounds for each opinion, and produce any written report made by the expert concerning those findings and opinions.

11. State in detail how you came to be referred to or treated by any health care provider name in your answers.

12. If you ever received any medical treatment to the body parts listed in your answer 7 (a) describe the nature and extent of the treatment and name all physicians, persons, hospitals, clinics or other health care providers who examined or treated you before or after the occurrence, with the approximate dates of such examination or treatment; and (b) if any disability or permanency rating of the condition was made, state the amount of disability, by whom made, and the part, or parts, or the body disabled.

13. If you used or consumed by any means any alcoholic beverages, sedatives, tranquilizers or other drugs or medicines within eight hours preceding this accident, identify the nature and amount of each, and state when and where obtained and consumed.

14. State the itinerary of the vehicle in which you were situated, including the time and place of the beginning of the trip, the time and duration of each stop, the place of destination and expected time of arrival.

15. State what part of the vehicle in which you were situated was damaged and, if it was estimated or repaired, the name and address of the person who performed such estimate or repairs, the dates of such work and the cost thereof. If such vehicle is unrepaired, state the address and the hours at which it may be seen.

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