

IN THE DISTRICT COURT OF MARYLAND FOR ANNE ARUNDEL COUNTY

Koloth of Qo'Nos :
Plaintiff :
vs. : Case No.
 : Trial Date:
Montgomery Scott :
Defendant :

INTERROGATORIES

TO: Koloth of Qo'Nos, Plaintiff
FROM: Montgomery Scott, Defendant

Instructions

Pursuant to Maryland Rule 3-421(3) (d), you are requested to answer within 15-days the following Interrogatories:

(a) Pursuant to Rule 3-421(b), your response shall set forth the interrogatory, and its answer, and "shall answer separately and fully in writing, or shall state fully the grounds for refusal to answer any interrogatory." The response shall be signed by you.

(b) Also pursuant to Rule 3-421(b), your answers "shall include all information available to [you] or through agents, representatives or attorneys."

(c) Pursuant to Rule 3-401(c), these interrogatories are continuing in character so as to require you to promptly amend or supplement your answers if you obtain further material information.

(d) If, pursuant to Rule 3-421(c), you elect to specify and produce business records of yours in answer to any interrogatory, then in accordance with that Rule your "specification shall be in sufficient detail to permit the interrogatory party to locate and identify, as readily as you can, the records from within the answer may be ascertained."

If in answering these interrogatories you encounter any ambiguities construing either a question, instruction or definition, set forth the matter deemed ambiguous and the construction used in answering.

Definitions

As used in these interrogatories, the following terms are to be interpreted in accordance with these definitions.

(a) Pursuant to Rule 1-202(o), the term "persons" includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, the State, its agencies or political subdivisions, any court, or any other governmental entity.

(b) Pursuant to Rule 3-421(b), the terms "you" and "your" include the person(s) to whom these interrogatories are addressed, and all of that person's agents, representatives or attorneys.

(c) Pursuant to Rule 3-422(a), the terms "document" or "documents" includes all "writings, drawings, graphs, charts, photographs, recordings, and other data compilations from which information can be obtained, translated, if necessary, by [you] through detection devices into reasonably usable form."

(d) The terms "identify", "identity" or "identification", when used in reference to a natural person, require you to state that person's full name, last known address, home and business telephone numbers, and present business affiliation. When used in reference to a person other than a natural person, the terms "identify", "identity" or "identification", require you to describe the nature of such person (that is, whether it is a corporation, partnership, etc. under the definition of "person" above), and to state that person's last known address, telephone number, and principal place of business. Once any person has been identified properly, it shall be sufficient thereafter when identifying that same person to state the name only.

(e) The terms "identify", "identity" or "identification" when used in reference to a document, require you to state the date, the author (or, if different, the signer or signers), the addressee, and the type of document (e.g. letter, memoranda, telegram, chart, etc.). If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. **In lieu of so identifying a document, at your option you may attach accurate copy of it to your answers to these interrogatories, appropriately labeled to correspond to the interrogatory in response to which it is being produced.**

(f) The term "occurrence" or "incident" means the accident or collision referenced in Plaintiff's Complaint.

1. State your full name, address, occupation, date of birth, marital status and Social Security number.

2. Identify the eyewitnesses to all or part of the occurrence and their location at the time thereto.

3. Identify all persons having personal knowledge of the facts and allegations complained of.

4. Give a concise statement of the facts as to how you contend that the occurrence took place, including the itinerary of your vehicle and place of destination and state the facts on which you base your contention that this Defendant(s) was negligent.

5. State whether you, or anyone on your behalf, have ever applied for or received Medicare benefits. If yes, state with particularity the basis of the claim, and the nature of any health related disability. Please identify each such claim by Health Insurance Claim Number (HICN).

6. Name all experts whom you propose to call as witnesses at trial and state the area or field in which each qualifies as an expert, state the subject matter on which each such expert is expected to testify, state the substance of the findings and the opinions to which each such expert is expected to testify and provide a summary of the grounds for each opinion. Attach to your answers copies of all written reports made for you or at your request by such experts.

7. Have you sustained an accidental injury or had any other accidents, motor vehicle or otherwise, prior to or since the occurrence complained of and, if so, state the following: (a) give date(s); (b) what injury was received, (c) how it was received, (d) the name and address of the person causing the injury, if caused by some other person, and (e) the names and addresses of all physicians and health care providers that treated you for said injuries.

8. State the precise nature and location of bodily injuries suffered by you as a result of the occurrence complained of and whether you now have any complaints as a result of the injuries sustained in the occurrence complained of. If so, state the nature of such present complaints, specifying which, if any, you contend are permanent.

9. If you know of the existence of any pictures, diagrams, videotapes, or objects (real evidence) relative to the occurrence or its consequences, state the nature, subject matter, date produced or obtained and the name and address of the present custodian of each. Please attach copies.

10. Itemize the expenses incurred by you and/or on your behalf as a result of the occurrence complained of and what salary, wages, income, etc., you allege you lost and attach any and all documents that you intend to introduce at trial to support any and all such claims to your answer.

11. Do you have in your control any statement from this Defendant(s) concerning this action or its subject matter? For purposes of this Interrogatory, a "statement" is defined as (a) a written statement signed or otherwise adopted or approved by this Defendant(s), or (b) a stenographic, mechanical, electrical or other recording, or transcription thereof which is a substantial verbatim recital of any oral statement made by this Defendant(s) and contemporaneously recorded. If the answer to this Interrogatory is in the affirmative, attach hereto a copy of said statement(s), and state the name and address of each person and/or corporation having copy thereof.

12. State whether you have ever been convicted of any infamous crimes or other crimes relevant to your credibility in the last 15 years, and if so, set forth the nature of such crimes, the dates of each conviction and the name and address of the Courts wherein each conviction occurred.

13. If you consumed any alcoholic beverages, drugs, and/or medications within eight (8) hours prior to said occurrence, state the kind and quantity you consumed, the names and addresses of the places where you consumed them, and the names and addresses of all persons present when you consumed them.

14. Identify any and all health care providers, physicians, medical providers, and/or hospitals that you have been treated and/or examined by in the last ten years, including treatment for the injuries you are claiming in this lawsuit, and state the dates and nature of such treatments. Attach any and all records pertaining to any such treatment.

15. If you contend that the Defendant has made an admission, or declaration against interest or you had any conversation with the Defendant, please state the substance of the alleged admission, declaration or conversation together with the time and place of the alleged admission, declaration or conversation and the names and addresses and telephone numbers of the persons, if any, who were present.

Respectfully submitted,

Areel Shaw, Esquire
State Farm Counsel
Attorney for Defendant
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