COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

DOCKET NO. «docket»

«plaintiff» )

Plaintiff, )

)

VS. )

)

«defendant» )

Defendant. )

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**DEFENDANT, «defendant»,**

**FIRST SET OF INTERROGATORIES PROPOUNDED TO THE PLAINTIFF, «plaintiff»**

Pursuant to Rule 33 of Massachusetts Rules of Civil Procedure, the Defendant, «defendant», demands that the Plaintiff, «plaintiff», answer fully, separately and under oath, the following Interrogatories within forty-five (45) days of receipt thereof.

**PRELIMINARY STATEMENT**

In answering these, the Plaintiff is required to set out each responsive fact, circumstance, act or course of conduct known to the Plaintiff, his agents, attorneys or other persons acting on his behalf or under his control, or about which any of the possess information.

**DEFINITIONS**

For purposes of these Interrogatories the uniform definitions set forth in Superior Court Standing Order 1-09 shall apply, and in addition, the following definitions shall apply, unless otherwise specified:

1. “You”, “your”, and “Plaintiff” shall refer to the named plaintiff,«plaintiff»;
2. “Defendant” will refer to the named defendant, «defendant», their agents, servants, employees, and trustees.

**INTERROGATORIES**

INTERROGATORY NO. 1

INTERROGATORY NO. 2

INTERROGATORY NO. 3

INTERROGATORY NO. 4

INTERROGATORY NO. 5

INTERROGATORY NO. 6

INTERROGATORY NO. 7

INTERROGATORY NO. 8

INTERROGATORY NO. 9

INTERROGATORY NO. 10

INTERROGATORY NO. 11

INTERROGATORY NO. 12

INTERROGATORY NO. 13

INTERROGATORY NO. 14

INTERROGATORY NO. 15

INTERROGATORY NO. 16

INTERROGATORY NO. 17

INTERROGATORY NO. 18

INTERROGATORY NO. 19

INTERROGATORY NO. 20

INTERROGATORY NO. 21

INTERROGATORY NO. 22

INTERROGATORY NO. 23

INTERROGATORY NO. 24

INTERROGATORY NO. 25

INTERROGATORY NO. 26

INTERROGATORY NO. 27

Respectfully submitted,

The Defendant,

«defendant»

By its attorney,

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