COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

DOCKET NO. «docket»

«plaintiff» , )

Plaintiff, )

)

VS. )

)

«defendant» , )

Defendant. )

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**PLAINTIFF, «plaintiff»‘S**

**FIRST SET OF INTERROGATORIES PROPOUNDED TO THE DEFENDANT, «defendant»**

Pursuant to Rule 33 of Massachusetts Rules of Civil Procedure, the Plaintiff, «plaintiff», demands that the Defendant, «defendant»’s 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 Defendant, 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 “Defendant” shall refer to the named Defendant, «defendant»;
2. “Plaintiff” will refer to the named Plaintiff, «plaintiff», 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 Plaintiff,

«plaintiff»,

By its attorney,

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