**List of Objections (with corresponding text to go in response)**

Irrelevant

* Irrelevant. Not reasonably calculated to lead to the discovery of admissible evidence.

Unintelligible as written.

Overbroad in time and scope.

Not limited in time and scope.

Overbroad [text box]

* Overbroad [WHAT IS IN TEXT BOX].

Vague and ambiguous [text box]

* Vague and ambiguous [WHAT IS IN TEXT BOX].

Speculation [text box]

* Calls for speculation [WHAT IS IN TEXT BOX].

Narrative

* Calls for a narrative.

Legal Conclusion

* Calls for a legal conclusion from a lay witness.

Expert Opinion

* Calls for an expert opinion from a lay witness.

Attorney-Client Privilege

Work Product

* This discovery request seeks attorney work product in violation of Code of Civil Procedure sections 2018.020 and 2018.030.

Premature Expert Opinion

* Calls for premature disclosure of expert witness opinion in violation of California Code of Civil Procedure sections 2034.210, 2034.220, and 2034.270.

Intended to harass and annoy.  
Unduly burdensome [text box]

* Unduly burdensome [WHAT IS IN TEXT BOX].

Duplicative [text box]

* This interrogatory is duplicative and intended to harass and annoy; the information sought has previously been provided in Responding Party’s response to [WHAT IS IN TEXT BOX]

Legal Reasoning

* This interrogatory is objectionable to the extent it seeks the legal reasoning and theories of plaintiff’s contentions. Plaintiff is not required to prepare the defendant’s case. (*Sav-On Drugs, Inc. v. Superior Court of Los Angeles County* (1975) 15 Cal.3d 1, 5; *Ryan v. Superior Court of Los Angeles County* (1960) 186 Cal.App.2d 813, 819.)

Privacy

* This interrogatory seeks information that is an invasion of privacy in violation of Article 1, Section 1 of the California Constitution.

Privacy - Third Party

* This interrogatory seeks information that is an invasion of third party rights to privacy in violation of Article 1, Section 1 of the California Constitution.

Premature [text box]

* Responding Party further objects to this request as unduly burdensome insofar as it is premature and not appropriate for the earliest stages of discovery. Such discovery, if proper at all, should be propounded after the completion of initial discovery, rather than during these early stages of the proceedings. Furthermore, discovery is ongoing, and Responding Party has not yet taken depositions or received discovery responses necessary to provide a complete response at this time. Because Propounding Party is seeking a response stating “[WHAT IS IN TEXT BOX]” at this early stage, the interrogatory is objectionable in its entirety and Responding Party is not required to provide any response.

Compilation [text box]

* This interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary.
  + \*\*\*NOTE\*\*\* If this objection is selected, the following text should come after the “Notwithstanding the foregoing objections…” language: Responding Party exercises their right to produce writings in response to this interrogatory, pursuant to California Code of Civil Procedure section 2030.230. Please see “[WHAT IS IN TEXT BOX]” produced concurrently herewith.

EXAMPLE FOR “COMPILATION” OBJECTION:

**SPECIAL INTERROGATORY NO. 1:**

State the amount of money you have paid each doctor that has treated you for your injuries.

**RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

Objection. This interrogatory would necessitate the preparation or the making of a compilation, abstract, audit, or summary. Notwithstanding the foregoing objections and subject thereto, Responding Party Responds as follows: Responding Party exercises their right to produce writings in response to this interrogatory, pursuant to California Code of Civil Procedure section 2030.230. Please see “Medical Bills” produced concurrently herewith.

**Other ideas:**

RESPONSES TO REQUESTS FOR PRODUCTION

There are two possible to responses to Requests/Demands for Production

If the Responding Party does not have any responsive documents they must respond:

* “After a diligent search and reasonable inquiry, Responding Party finds no responsive documents in their possession, custody, or control, because [ONE OF THREE OPTIONS: 1: no such documents have ever existed; 2: no such documents have ever been in the possession, custody, or control of Responding Party; OR 3: any such documents have been destroyed, lost, misplaced or stolen.] Any responsive documents are believed to be in the possession, custody, or control of [ENTITY THAT MIGHT HAVE DOCUMENTS].

If the Responding Party does have responsive documents, they must respond:

* Responding Party will comply with this demand. Please see “[NAME OF FOLDER WITH RESPONSIVE DOCUMENTS]” produced concurrently herewith.

It would be nice if these responses were automatically placed into the Response section to Requests for Production so that I can just delete what I don’t need.

Please don’t hesitate to let me know if you have any questions!