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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY NAME OF COUNTYX**

|  |  |
| --- | --- |
| PLAINTIFFX, an individual;  Plaintiff,  vs.  DEFENDANTX; Does 1 TO 10, Inclusive,  Defendants. | **Case No. CASE NUMBERX**  **PLAINTIFF’S RESPONSES TO DOCUMENTX** |

PROPOUNDING PARTY: Defendant, DEFENDANTX

RESPONDING PARTY: Plaintiff, PLAINTIFFX

SET NUMBER: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLAINTIFF, PLAINTIFFX, (hereinafter “Responding Party”) makes the following answers and objections to the DOCUMENTX, Set One.

**PRELIMINARY STATEMENT**

Plaintiff’s investigation and discovery of the facts relating to this case, and preparation for trial, are continuing and not complete. All of the responses contained herein are presently available to and specifically known to this Plaintiff and disclose only those contentions which presently occur to such Plaintiff. This Plaintiff will, during the course of this litigation, pursue extensive formal discovery, as well as extensive investigation and informal discovery on her own. Therefore, without suggesting or implying any interest to respond less than fully to the Demand for Production, this Plaintiff must point out that her responses are of necessity of a somewhat preliminary nature and that the full factual basis concerning this matter is yet to be developed with complete precision. However, this Plaintiff assumes no obligation to voluntarily supplement or amend these responses to reflect any facts, contentions, witnesses, and evidence which may be discovered following the serving of theses response. The response contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as is presently known.

**SPECIAL INTERROGATORY NO. 1:**

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

**SPECIAL INTERROGATORY NO. 2:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

**SPECIAL INTERROGATORY NO. 3:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

**SPECIAL INTERROGATORY NO. 4:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

**SPECIAL INTERROGATORY NO. 5:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

**SPECIAL INTERROGATORY NO. 6:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

**SPECIAL INTERROGATORY NO. 7:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

**SPECIAL INTERROGATORY NO. 8:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

**SPECIAL INTERROGATORY NO. 9:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

**SPECIAL INTERROGATORY NO. 10:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

**SPECIAL INTERROGATORY NO. 11:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

**SPECIAL INTERROGATORY NO. 12:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

**SPECIAL INTERROGATORY NO. 13:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

**SPECIAL INTERROGATORY NO. 14:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

**SPECIAL INTERROGATORY NO. 15:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

**SPECIAL INTERROGATORY NO. 16:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

**SPECIAL INTERROGATORY NO. 17:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

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**RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

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**RESPONSE TO SPECIAL INTERROGATORY NO. 51:**

**SPECIAL INTERROGATORY NO. 52:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 52:**

**SPECIAL INTERROGATORY NO. 53:**

**RESPONSE TO SPECIAL INTERROGATORY NO. 53:**

Dated: DATE  **COHEN LAW PARTNERS**

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Darren A. Reid

Attorneys for Plaintiff