|  |  |  |
| --- | --- | --- |
| STATE OF SOUTH CAROLINA  COUNTY OF {county\_name\_allCaps}  {plaintiff\_name},  {plaintiff\_number},  vs.  {defendant\_name},  {defendant\_number}.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | )  )  )  )  )  )  )  )  )  )  )  )  ) | {court\_name\_allCaps}  CASE NO. {case\_number}  **PLAINTIFF’S**  **RESPONSES TO DEFENDANTS’ {interrogatories\_number} SET OF**  **INTERROGATORIES AND**  **REQUESTS FOR PRODUCTION** |

TO: {to\_line}

**OBJECTIONS**

The plaintiff objects to the defendants’ discovery requests, to the extent that they are overly broad, unduly burdensome, not limited in scope and time, not reasonably calculated to lead to the discovery of admissible evidence, seek to discover attorney-client privileged information, seek to discover work-product, seek to discover therapist-patient information, seek to discover priest-penitent information, seek to discover otherwise privileged information, seek to discover by scorched-earth means, are intended only to burden and harass the plaintiffs, are irrelevant, exceed the number of requests allowed by the Rules, and are improper based on other objections. Without waiving these objections, the plaintiff responds to the defendants’ requests as follows. The plaintiff will supplement these requests as necessary. In an effort to fully respond, the plaintiff produces all discoverable information and documents herewith.

**RESPONSES TO INTERROGATORIES**

**RESPONSES TO REQUESTS FOR PRODUCTION**

Respectfully Submitted,

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{footer\_attorney\_2\_email}

{footer\_attorney\_3\_email}

Attorneys for Plaintiff

{footer\_city\_state}

{filing\_date}