Alan A. Ahdoot, Esq. (State Bar No. 238594)

Christopher B. Adamson, Esq. (State Bar No. 238500)

{{ acting\_attorney }}, Esq. (State Bar No. 225306)

**ADAMSON AHDOOT LLP**

1122 S. La Cienega Blvd.

Los Angeles, California 90035

T: (310) 888-0024

F: (888) 895-4665

E: [alan@aa.law](mailto:alan@aa.law)

E: [christopher@aa.law](mailto:christopher@aa.law)

E: [arash@aa.law](mailto:arash@aa.law)

Attorneys for Plaintiff

{{ plaintiff }}

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF {{ county }}**

**{{ jurisdiction }}**

|  |  |  |
| --- | --- | --- |
| {{ plaintiff }} , an individual,  Plaintiff,  vs.  {{ defendant }},  Defendants. |  | Case No.: {{case\_no }}  Case Assigned for All Purposes To:  {{ judge }}  {{ department }}  **PLAINTIFF’S RESPONSES TO DEFENDANT {{ defendant }}’S FORM INTERROGATORIES, SET ONE**  Complaint Filed: {{complaint\_filed }}  Trial Date: {{ trial\_date }} |
|  |  |  |

PROPOUNDING PARTY: DEFENDANT, {{ defendant }}

RESPONDING PARTY: PLAINTIFF, {{ plaintiff }}

SET NUMBER: ONE

//

//

//

Pursuant to California *Code of Civil Procedure* section 2030.010 *et seq*., Plaintiff {{ plaintiff }} (“Plaintiff” or “Responding Party”) provides responses to Defendant {{ defendant }}’S (“Defendant”), Form Interrogatories, Set One as follows:

**I. PRELIMINARY STATEMENT­­**

1. Plaintiff has not completed its investigation or discovery in this action. As discovery proceeds, facts, information, evidence, documents and other tangible things may be discovered which are not known and, therefore, are not discussed or set forth in this Response; but which may be responsive to this set of Form Interrogatories. This Response is based on Plaintiff’s knowledge, information, and belief at this time and is complete as to its best knowledge and understanding at this time. This Response was prepared based on Plaintiff’s good faith interpretation and understanding of the individual form interrogatories contained within this set and is subject to correction for inadvertent errors or admissions, if any. Plaintiff reserves the right to refer to, to conduct discovery with reference to, and/or to offer into evidence at the time of trial, any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents and things in this Response. Plaintiff assumes no obligation to voluntarily supplement or amend this Response to reflect facts, evidence, documents or tangible things discovered following service of this response. Nevertheless, this Response is given without prejudice to subsequent revision or supplementation based upon any facts, evidence, and documentation that hereafter may be discovered.

2. To the extent any question in this set of Form Interrogatories seeks information that is not reasonably calculated to lead to the discovery of admissible evidence, Plaintiff declines to produce such information on the ground that the information sought is irrelevant.

3. To the extent any question in this set of Interrogatories seeks information that is protected by the attorney-client privilege and/or the attorney work product doctrine, Plaintiff declines to produce such information, which would include:

a. All confidential communications between Plaintiff, or any of its agents or employees, and its counsel, or any of its counsel’s agents and employees, regarding Plaintiff’s claims and the claims of Plaintiff in this action; and

b. All references to documents prepared for use in this litigation or in anticipation of litigation, including notes, memoranda, pleadings, and correspondence prepared by, at the direction of, or for review by counsel for Plaintiff, regarding Plaintiff’s claims and the claims of Plaintiff in this action.

4. To the extent the information sought by this set of Form Interrogatories is duplicative and/or cumulative of information sought by other written discovery that was propounded by Plaintiff concurrently with this set of Form Interrogatories, Plaintiff declines to respond to those Form Interrogatories seeking such information.

**II. GENERAL OBJECTIONS**

1. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek information protected from discovery by the attorney-client privilege and/or attorney work-product doctrine.

2. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek the discovery of information regarding third persons, on the grounds that such information is protected from discovery by federal and state constitutional, statutory, and common laws.

3. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek information that contains or makes reference to confidential and/or proprietary business information belonging to or concerning Plaintiff and its business.

4. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek information which is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence, on the ground that they seek evidence outside the permissible scope of discovery.

5. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek information that is overly broad as to time and subject matter.

6. Plaintiff objects to these Form Interrogatories in their entirety to the extent they seek information that is duplicative and/or cumulative of information sought by other written discovery propounded by Defendant.

7. Plaintiff objects to these Form Interrogatories in their entirety to the extent they prematurely seek to bind Plaintiff to responses and positions it may wish to change if it subsequently discovers new facts. (*See Singer v. Superior Court* (1960)54 Cal.2d 318.)

**III. RESPONSES AND OBJECTIONS TO FORM INTERROGATORIES**

Subject to and without waiving the foregoing objections in any way, all of which are incorporated herein by reference into each of the following individual responses as if fully set forth therein, and to the extent Plaintiff understands each of the individual Form Interrogatories contained in the set, Plaintiff responds and objects as follows:

**RESPONSES TO FORM INTERROGATORIES**

**FORM INTERROGATORY NO.1.1:**

State the name, ADDRESS, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

**RESPONSE TO FORM INTERROGATORY NO.1.1:**

Plaintiff {{ plaintiff }}, who may be contacted through their counsel of record, {{ aciting\_attorney }}, Esq., Adamson Ahdoot LLP, 1122 S. La Cienega Blvd., Los Angeles, CA 90035, T: 310.888.0024.

**FORM INTERROGATORY NO.2.1:**

State:

(a) your name;

(b) every name you have used in the past; and

(c) the dates you used each name.

**RESPONSE TO FORM INTERROGATORY NO. 2.1:**

Objection. This interrogatory violates Plaintiff’s right to privacy. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

1. {{ responses.2.1 }}
2. ;
3. ;

**FORM INTERROGATORY NO. 2.2:**

State the date and place of your birth.

**RESPONSE TO FORM INTERROGATORY NO. 2.2:**

{{ responses.2.2 }}

**FORM INTERROGATORY NO. 2.3**:

At the time of the **INCIDENT,** did you have a driver’s license? If so state:

1. the state or other issuing entity;
2. the license number and type;
3. the date of issuance; and
4. all restrictions.

**RESPONSE TO FORM INTERROGATORY NO. 2.3:**

Objection. This interrogatory seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. In addition, this interrogatory invades Plaintiff’s constitutional right to privacy, and is overbroad, burdensome, and oppressive. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ license\_verification }}.

1. {{ license\_state }};
2. {{license\_number}}, {{ license\_type }};
3. {{ license.issuance }};
4. {{ license\_restrictions }};

**FORM INTERROGATORY NO. 2.4:**

At the time of the **INCIDENT,** did you have any other permit or license for the operation of a motor vehicle? If so, state:

1. the state or other issuing entity;
2. the license number and type;
3. the date of issuance; and
4. all restrictions.

**RESPONSE TO FORM INTERROGATORY NO. 2.4:**

Objection. This interrogatory seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. This interrogatory also invades Plaintiff’s constitutional right to privacy, and is overbroad, burdensome, and oppressive. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.2.4 }}

**FORM INTERROGATORY NO. 2.5:**

State:

(a) your present residence **ADDRESS**;

(b) your residence **ADDRESSES** for the past five years; and

(c) the dates you lived at each **ADDRESS**.

**RESPONSE TO FORM INTERROGATORY NO. 2.5:**

Objection. This interrogatory seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. This interrogatory also invades Plaintiff’s constitutional right to privacy, and is overbroad, burdensome, and oppressive. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.2.5 }}

**FORM INTERROGATORY NO. 2.6:**

State:

(a) The name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and

(b) the name, **ADDRESS**, dates of employment, job title and nature of work for each employer or self-employment you have had from five years before the INCIDENT until today.

**RESPONSE TO FORM INTERROGATORY NO. 2.6:**

Objection. This interrogatory invades Plaintiff’s constitutional right to privacy, and is overbroad, burdensome, oppressive, and unduly harassing. Subject to and without waiving said objections, Plaintiff responds as follows:

{{ responses.2.6 }}

**FORM INTERROGATORY NO. 2.7:**

State:

(a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended beginning with high school;

(b) the dates you attended;

(c) the highest grade level you have completed; and

(c) the degrees received.

**RESPONSE TO FORM INTERROGATORY NO. 2.7:**

Objection. This interrogatory violates Plaintiff’s right to privacy. This interrogatory also seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. Further, this interrogatory is overbroad. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.2.7 }}

**FORM INTERROGATORY NO. 2.8:**

Have you ever been convicted of a felony? If so, for each conviction state:

(a) the city and state where you were convicted;

(b) the date of conviction;

(c) the offense; and

(d) the court and case number.

**RESPONSE TO FORM INTERROGATORY NO. 2.8:**

Objection. This interrogatory violates Plaintiff’s right to privacy. This interrogatory also seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. Further, this interrogatory is overbroad. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.2.8 }}

**FORM INTERROGATORY NO. 2.9:**

Can you speak English with ease? If not, what language and dialect do you normally use?

**RESPONSE TO FORM INTERROGATORY NO. 2.9:**

{{ responses.2.9 }}

**FORM INTERROGATORY NO. 2.10:**

Can you read and write English with ease? If not, what language and dialect do you normally use?

**RESPONSE TO FORM INTERROGATORY NO. 2.10:**

{{ responses.2.10 }}

**FORM INTERROGATORY NO. 2.11:**

At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:

(a) the name, **ADDRESS**, and telephone number of that **PERSON**: and

(b) a description of your duties.

**RESPONSE TO FORM INTERROGATORY NO. 2.11:**

Objection. Plaintiff objects to this interrogatory on the grounds that it is overbroad. Plaintiff also objects to the extent information sought is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving foregoing objections, Plaintiff responds as follows:

{{ responses.2.11 }}

**FORM INTERROGATORY NO. 2.12:**

At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:

(a) the name, ADDRESS, and telephone number;

(b) the nature of the disability or condition; and

(c) the manner in which the disability or condition contributed to the occurrence of the INCIDENT.

**RESPONSE TO FORM INTERROGATORY NO. 2.12:**

Objection. This interrogatory seeks an expert medical opinion and/or conclusion. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.2.12 }}

**FORM INTERROGATORY NO. 2.13:**

Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:

1. the name, **ADDRESS**, and telephone number;
2. the nature or description of each substance;
3. the quantity of each substance used or taken;
4. the date and time of day when each substance was used or taken;
5. the **ADDRESS** where each substance was used or taken;
6. the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
7. the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

**RESPONSE TO FORM INTERROGATORY NO. 2.13:**

Objection. This interrogatory seeks an expert medical opinion and/or conclusion. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.2.13 }}

**FORM INTERROGATORY NO. 4.1:**

At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:

(a) the kind of coverage;

(b) the name and **ADDRESS** of the insurance company;

(c) the name, **ADDRESS**, and telephone number of each named insured;

(d) the policy number;

(e) the limits of coverage for each type of coverage contained in the policy;

(f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and

(g) the name, **ADDRESS** and telephone number of the custodian of the policy.

**RESPONSE TO FORM INTERROGATORY NO. 4.1:**

Objection. This interrogatory invades Plaintiff’s right to privacy. This interrogatory is overbroad as to scope and subject matter of this litigation. This interrogatory seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence in violation of the collateral source rule. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.4.1 }}

**FORM INTERROGATORY NO. 4.2:**

Are you self-insured under any statue for the damages, claims, or actions that have arisen out of the INCIDENT? If so, specify the statute.

**RESPONSE TO FORM INTERROGATORY NO. 4.2:**

{{ responses.4.2 }}

**FORM INTERROGATORY NO. 6.1:**

Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? *(If your answer is “no,” do not answer interrogatories 6.2 through 6.7)*.

**RESPONSE TO FORM INTERROGATORY NO. 6.1:**

Plaintiff objects to this interrogatory to the extent it seeks an expert medical opinion or conclusion. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

Yes.

**FORM INTERROGATORY NO. 6.2:**

Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

**RESPONSE TO FORM INTERROGATORY NO. 6.2:**

Objection. This interrogatory seeks an expert medical opinion and/or conclusion. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.6.2 }}

Please refer to Plaintiff’s medical records provided in response to your Request for Production of Documents for more a more detailed and exhaustive review of complaints.

**FORM INTERROGATORY NO. 6.3:**

Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:

1. a description;
2. whether the complaint is subsiding, remaining the same, or becoming worse; and
3. the frequency and duration.

**RESPONSE TO FORM INTERROGATORY NO. 6.3:**

Objection. This interrogatory seeks an expert medical opinion and/or conclusion. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.6.3 }}

These complaints are not exhaustive; please refer to Plaintiff’s medical records produced concurrently herewith Plaintiff’s responses to Defendant’s Request for Production.

**FORM INTERROGATORY NO. 6.4:**

Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

1. the name, **ADDRESS**, and telephone number;
2. the type of consultation, examination, or treatment provided;
3. the dates you received consultation, examination, or treatment; and
4. the charges to date.

**RESPONSE TO FORM INTERROGATORY NO. 6.4:**

Objection. Plaintiff objects to this interrogatory to the extent it violates his constitutional right to privacy and is vague and ambiguous. Plaintiff also objects to this interrogatory to the extent that it calls for expert medical opinion or conclusion. Subject to and without waiving the aforementioned objections, Plaintiff responds to the best of her ability as follows:

{{ medical\_info }}

**FORM INTERROGATORY NO. 6.5:**

Have you taken any medication, prescribed or not, as a result of the injuries that you attribute to the **INCIDENT**? If so, for each medication state:

1. the name;
2. the **PERSON** who prescribed or furnished it;
3. the date it was prescribed or furnished;
4. the dates you began and stopped taking it; and
5. the cost to date.

**RESPONSE TO FORM INTERROGATORY NO. 6.5:**

Objection.This interrogatory violates Plaintiff’s constitutional right to privacy. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

Plaintiff will produce medical records which contain all of her medications in detail and which are available to the propounding party.

**FORM INTERROGATORY NO. 6.6:**

Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each state:

1. the nature;
2. the date;
3. the cost; and
4. the name**, ADDRESS**, and telephone number of each provider.

**RESPONSE TO FORM INTERROGATORY NO. 6.6:**

Objection. The question calls for a professional opinion from a lay witness; consequently, the question is oppressive, harassing and without a foundational showing of competency. Without waiving such objection, and in the spirit of cooperation, plaintiff responds as follows:

Please refer to Plaintiff’s medical records which are being produced in response to Defendant’s Request for Production of Documents, Set One, for relevant medical services.

**FORM INTERROGATORY NO. 6.7:**

Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

1. the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
2. the complaints for which the treatment was advised; and
3. the nature, duration, and estimated cost of the treatment.

**RESPONSE TO FORM INTERROGATORY NO. 6.7:**

Objection. This interrogatory violates Plaintiff’s constitutional right of privacy. This interrogatory also seeks an expert medical opinion and/or conclusion. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Please refer to Plaintiff’s medical records which are being produced in response to Defendant’s Request for Production of Documents, Set One, for relevant future medical treatment that was advised.

**FORM INTERROGATORY NO. 7.1:**

Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

(a) describe the property;

(b) describe the nature and location of the damage to the property;

(c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and

(d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

**RESPONSE TO FORM INTERROGATORY NO. 7.1:**

{{ responses.7.1 }}

**FORM INTERROGATORY NO. 7.2**:

Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate evaluation state:

1. the name, **ADDRESS,** and telephone number of the **PERSON** who prepared it and the date prepared;
2. the name, **ADDRESS,** and telephone number of each **PERSON** who has a copy of it; and
3. the amount of damage stated.

**RESPONSE TO FORM INTERROGATORY NO. 7.2:**

{{ responses.7.2 }}

**FORM INTERROGATORY NO. 7.3**:

Has any item of property referred to in your answer to Interrogatory 7.1 been repaired? If so, for each item state:

1. the date repaired;
2. a description of the repair;
3. the repair cost;
4. the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
5. the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

**RESPONSE TO FORM INTERROGATORY NO. 7.3:**

{{ responses.7.3 }}

**FORM INTERROGATORY NO. 8.1:**

Do you attribute any loss of income or earning capacity to the **INCIDENT**? *(If your answer is “no,” do not answer interrogatories 8.2 through 8.8)*.

**RESPONSE TO FORM INTERROGATORY NO. 8.1:**

Objection. This interrogatory violates Plaintiff’s constitutional right to privacy. This interrogatory also calls for premature disclosure of expert testimony and/or evidence. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.8.1 }}

**FORM INTERROGATORY NO. 8.2:**

State:

1. the nature of your work;
2. your job title at the time of the **INCIDENT**; and
3. the date your employment began.

**RESPONSE TO FORM INTERROGATORY NO. 8.2:**

{{ responses.8.2 }}

**FORM INTERROGATORY NO. 8.3:**

State the last date before the **INCIDENT** that you worked for compensation.

**RESPONSE TO FORM INTERROGATORY NO. 8.3:**

{{ responses.8.3 }}

**FORM INTERROGATORY NO. 8.4:**

State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

**RESPONSE TO FORM INTERROGATORY NO. 8.4:**

{{ responses.8.4 }}

**FORM INTERROGATORY NO. 8.5:**

State the date you returned to work at each place of employment following the **INCIDENT**.

**RESPONSE TO FORM INTERROGATORY NO. 8.5:**

{{ responses.8.5 }}

**FORM INTERROGATORY NO. 8.6:**

State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

**RESPONSE TO FORM INTERROGATORY NO. 8.6:**

{{ responses.8.6 }}

**FORM INTERROGATORY NO. 8.7:**

State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

**RESPONSE TO FORM INTERROGATORY NO. 8.7:**

{{ responses.8.7 }}

**FORM INTERROGATORY NO. 8.8:**

Will you lose income in the future as a result of the **INCIDENT**? If so, state:

1. the facts upon which you base this contention;
2. an estimate of the amount;
3. an estimate of how long you will be unable to work; and
4. how the claim for future income is calculated.

**RESPONSE TO FORM INTERROGATORY NO. 8.8:**

{{ responses.8.8 }}

**FORM INTERROGATORY NO. 9.1:**

Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:

1. the nature;
2. the date it occurred;
3. the amount; and
4. the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.

**RESPONSE TO FORM INTERROGATORY NO. 9.1:**

Objection to the extent this interrogatory calls for expert opinion and/or conclusion, or attorney work-product doctrine. Plaintiff is not a medical doctor, economist nor a medical billing reviewer in order to determine such issues as liability, fault, causation, negligence, and apportionment and whether or not the medical services provided to Plaintiff in this matter were or were not due to the subject incident. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.9.1 }}

**FORM INTERROGATORY NO. 9.2:**

Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in Interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

**RESPONSE TO FORM INTERROGATORY NO. 9.2:**

Objection to the extent this interrogatory calls for expert opinion and/or conclusion, or attorney work-product doctrine. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.9.2 }}

**FORM INTERROGATORY NO. 10.1:**

At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:

1. a description of the complaint or injury;
2. the dates it began and ended; and
3. the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.

**RESPONSE TO FORM INTERROGATORY NO. 10.1:**

Plaintiff objects to this interrogatory on the grounds that it violates her right to privacy. The interrogatory is impermissibly overbroad and therefore oppressive, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence with regard to the subject matter of this action in that it seeks disclosure of Plaintiff’s personal history, which, except as answered, does not reasonably relate to the injuries that are the subject of this action. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.10.1 }}

**FORM INTERROGATORY NO. 10.2:**

List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**.

**RESPONSE TO FORM INTERROGATORY NO. 10.2:**

Objection. This interrogatory violates Plaintiff’s right to privacy. The interrogatory is also impermissibly overbroad and therefore oppressive, burdensome, and irrelevant to the subject matter of this action in that it seeks disclosure of Plaintiff’s personal history, which, except as answered, does not reasonably relate to the injuries that are the subject of this action. Further, this interrogatory is vague with respect to the phrase “physical, mental, and emotional disabilities.” Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.10.2 }}

**FORM INTERROGATORY NO. 10.3:**

At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each **INCIDENT** giving rise to an injury state:

1. the date and the place it occurred;
2. the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
3. the nature of any injuries you sustained;
4. the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
5. the nature of the treatment and its duration.

**RESPONSE TO FORM INTERROGATORY NO. 10.3:**

Objection. This interrogatory violates Plaintiff’s right to privacy. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.10.3 }}

**FORM INTERROGATORY NO. 11.1:**

Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

1. the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
2. the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;
3. the court, names of the parties, and case number of any action filed;
4. the name, **ADDRESS**, and telephone number of any attorney representing you;
5. whether the claim or action has been resolved or is pending; and
6. a description of the injury.

**RESPONSE TO FORM INTERROGATORY NO. 11.1:**

Objection. This interrogatory is vague, ambiguous, and overbroad. This request violates the Responding Party’s right to privacy under Article 1 section 1 of the California Constitution as well as Federal Privacy rights laws. (See also *San Diego Trolley, Inc. v. Superior Court* (2001) 87 Cal.App.4th 108). This request is not relevant to the Responding Party’s complaint. Without waiving the foregoing objections, Responding Party responds as follows:

{{ responses.11.1 }}

**FORM INTERROGATORY NO. 11.2**:

In the past 10 years have you made a written claim or demand for workers’ compensation benefits? If so, for each claim or demand state:

1. the date, time, and place of the **INCIDENT** giving rise to the claim;
2. the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
3. the name, **ADDRESS**, and telephone number of the workers’ compensation insurer and the claim number;
4. the period of time during which you received workers’ compensation benefits;
5. a description of the injury;
6. the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
7. the case number at the Workers’ Compensation Appeals Board.

**RESPONSE TO FORM INTERROGATORY NO. 11.2:**

Objection. This interrogatory is vague, ambiguous, and overbroad. This request violates the Responding Party’s right to privacy under Article 1 section 1 of the California Constitution as well as Federal Privacy rights laws. (See also *San Diego Trolley, Inc. v. Superior Court* (2001) 87 Cal.App.4th 108). Objection. This request is not relevant to the Responding Party’s complaint. Without waiving the foregoing objections, Responding Party responds as follows:

{{ responses.11.2 }}

**FORM INTERROGATORY NO. 12.1:**

State the name, **ADDRESS**, and telephone number of each individual:

1. who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
2. who made any statement at the scene of the **INCIDENT**;
3. who heard any statements made about the **INCIDENT** by any individual at the scene; and
4. who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).

**RESPONSE TO FORM INTERROGATORY NO. 12.1:**

Objection. This interrogatory violates Plaintiff’s right to privacy and is overbroad. This interrogatory also violates the attorney-client privilege and/or attorney work product protection. This interrogatory seeks the premature disclosure of expert information. Further, this interrogatory seeks information neither relevant to the subject matter of this lawsuit nor calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.12.1 }}

**FORM INTERROGATORY NO. 12.2:**

Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each statement state:

1. the name, **ADDRESS**, and telephone number of the individual interviewed;
2. the date of the interview; and
3. the name, **ADDRESS**, and telephone number of each **PERSON** who conducted the interview.

**RESPONSE TO FORM INTERROGATORY NO. 12.2:**

Objection. This interrogatory violates the attorney-client privilege and/or attorney work product protection. This interrogatory seeks the premature disclosure of expert opinion and information. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.12.2 }}

**FORM INTERROGATORY NO. 12.3:**

Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:

1. the name, **ADDRESS**, and telephone number of the individual from whom the state was obtained;
2. the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
3. the date the statement was obtained; and
4. the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

**RESPONSE TO FORM INTERROGATORY NO. 12.3:**

Objection. This interrogatory violates the attorney-client privilege and/or attorney work product protection. This interrogatory seeks the premature disclosure of expert opinion and information. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

{{ responses.12.3 }}

**FORM INTERROGATORY NO. 12.4:**

Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object or individual concerning the **INCIDENT** or plaintiff’s injuries? If so, state:

1. the number of photographs or feet of film or videotape;
2. the places, objects, or persons photographed, filmed or videotaped;
3. the date the photographs, films or videotapes were taken;
4. the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
5. the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

**RESPONSE TO FORM INTERROGATORY NO. 12.4:**

Plaintiff objects to this interrogatory on the grounds that it violates attorney-client privilege and/or attorney work product protection. Plaintiff further objects on the grounds that interrogatory calls for speculation. To the extent information sought is equally or more readily available to Defense Counsel, Plaintiff objects. This interrogatory calls for the premature disclosure of expert opinion and expert information. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.12.4 }}

**FORM INTERROGATORY NO. 12.5:**

Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure section 2034) concerning the **INCIDENT**? If so, for each item state:

1. the type (i.e. diagram, reproduction, or model);
2. the subject matter; and
3. the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

**RESPONSE TO FORM INTERROGATORY NO. 12.5:**

Objection. This interrogatory is vague, ambiguous, and unintelligible. Objection. This interrogatory seeks information which is protected from disclosure by the attorney-client privilege and attorney work-product privilege. Objection. This interrogatory seeks documents that disclose the identity, writings, and/or opinions of Plaintiff’s experts who have been retained and/or utilized to date solely as an advisor or consultant. It is violative of the work-product privilege. See *South Tahoe Public Utilities District v. Superior Court* (1979) 90 Cal.App.3d 135, *Sheets v. Superior Court* (1967) 257 Cal.App.2d 1 and *Sanders v. Superior Court* (1973) 34 Cal.App.3d 270. Without waiving the foregoing objections, Responding Party responds as follows:

{{ responses.12.5 }}

**FORM INTERROGATORY NO. 12.6:**

Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

1. the name, title, identification number, and employer of the **PERSON** who made the report;
2. the date and type of report made;
3. the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
4. the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

**RESPONSE TO FORM INTERROGATORY NO. 12.6:**

Objection. This interrogatory is vague, ambiguous, and unintelligible. This interrogatory seeks information which is protected from disclosure by the attorney-client privilege and attorney work-product privilege. This interrogatory seeks documents that disclose the identity, writings, and/or opinions of Plaintiff’s experts who have been retained and/or utilized to date solely as an advisor or consultant. It is violative of the work-product privilege. See *South Tahoe Public Utilities District v. Superior Court* (1979) 90 Cal.App.3d 135, *Sheets v. Superior Court* (1967) 257 Cal.App.2d 1 and *Sanders v. Superior Court* (1973) 34 Cal.App.3d 270. Without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.12.6 }}

**FORM INTERROGATORY NO. 12.7:**

Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

1. the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310); and
2. the date of the inspection.

**RESPONSE TO FORM INTERROGATORY NO. 12. 7:**

Objection. This interrogatory is vague, ambiguous, and unintelligible. This interrogatory seeks information which is protected from disclosure by the attorney-client privilege and attorney work-product privilege. This interrogatory seeks documents that disclose the identity, writings, and/or opinions of Plaintiff’s experts who have been retained and/or utilized to date solely as an advisor or consultant. It is violative of the work-product privilege. See *South Tahoe Public Utilities District v. Superior Court* (1979) 90 Cal.App.3d 135, *Sheets v. Superior Court* (1967) 257 Cal.App.2d 1 and *Sanders v. Superior Court* (1973) 34 Cal.App.3d 270. Without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.12.7 }}

**FORM INTERROGATORY NO. 14.1:**

Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS,** and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

**RESPONSE TO FORM INTERROGATORY NO. 14.1:**

Objection. This interrogatory seeks Plaintiff’s counsel’s legal analysis and theories concerning applicable laws, ordinances, and safety orders, thereby invading the attorney’s work product protection. This interrogatory also seeks identification of a “statute,” “ordinance,” or “regulation,” on the basis that it seeks attorney work product. This interrogatory calls for the premature disclosure of expert information/opinion. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.14.1 }}

**FORM INTERROGATORY NO. 14.2:**

Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT?** If so, for each **PERSON STATE**:

1. the name, **ADDRESS**, and telephone number of the **PERSON;**
2. the statute, ordinance, or regulation allegedly violated;
3. whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
4. the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

**RESPONSE TO FORM INTERROGATORY NO. 14.2:**

Objection. This interrogatory seeks Plaintiff’s counsel’s legal analysis and theories concerning applicable laws, ordinances, and safety orders, thereby invading the attorney’s work product protection. This interrogatory also seeks identification of a “statute,” “ordinance,” or “regulation,” on the basis that it seeks attorney work product. This interrogatory calls for the premature disclosure of expert information/opinion. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

{{ responses.14.2 }}

Dated: May 15, 2025 ADAMSON AHDOOT LLP

By:

{{ acting\_attorney }}, Esq.

Attorneys for Plaintiff

{{ plaintiff }}

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1122 S. La Cienega Blvd., Los Angeles, CA 90035.

On May 15, 2025, I served the document(s) described as: **PLAINTIFF’S RESPONSES TO {{ defendant }}’S FORM INTERROGATORIES, SET ONE,** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

{{ defendant\_counsel\_info }}

{{ defendant\_counsel\_firm }}

{{ defendant\_counsel\_address }

{{ defendant\_counsel\_phone }}

Email: {{defendant\_counsel\_email }}

Attorneys for Defendant

**{{ defendant }}**

**(BY OVERNIGHT DELIVERY)** I caused a true copy thereof to be enclosed in a sealed envelope with delivery fees provided for, and to be deposited in the box regularly maintained by Federal Express in Los Angeles, CA.

**(BY ELECTRONIC MAIL)** By electronically serving the document(s) to the electronic mail address set forth above on this date by or before 11:59 p.m., pursuant to California Rules of Court, Rule 2.251, and consistent with Code of Civil Procedure § 1010.6(a)(2), (4) and (5).

**(BY FACSIMILE)** I sent such document via facsimile mail to the number(s) noted above. The transmission was reported as complete and without error, and the transmitting facsimile machine properly issued the transmission report.

**(BY MAIL)** As follows: I placed such envelope, with postage thereon prepaid, in the United States mail at Los Angeles, California.

I am “readily familiar” with the firm’s practice of collecting and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid, at Los Angeles, California, in the ordinary course of business. I am aware that, on motion of the party served, service is presumed invalid if the postal cancellation or postage meter date is more than one day after the date of deposit for mailing in this affidavit.

**(STATE)** I declare, under penalty of perjury under the laws of the State of California, that the above is true and correct.

Executed on May 15, 2025, at Los Angeles, California.

{{ acting\_clerk }}