

**MY RIGHTS LAWYERS, L.L.C.**

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Attorneys for Plaintiff, \_\_\_\_\_  
Name

_____, Plaintiff,	<b>SUPERIOR COURT OF NEW JERSEY LAW DIVISION</b>
vs.	_____
_____	Docket No. _____
_____	Civil Action
_____,	<b>INITIAL INTERROGATORIES PROPOUNDED ON DEFENDANTS</b>
Defendants.	_____ Date

TO: Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Email: \_\_\_\_\_  
Attorney for Defendants

**PLEASE TAKE NOTICE** that Plaintiff, Name: \_\_\_\_\_, hereby requests answers under oath from Defendant(s) to the following Interrogatories within 60 days and in the manner prescribed by New Jersey Civil Rules of Procedure.

These Interrogatories are continuing Interrogatories, and you are required to immediately supplement answers to these Interrogatories if you and/or your attorney and/or your representatives obtain further information following the time you answer these Interrogatories up to the time of trial.

By: /s/ Michelle J. Douglass

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Michelle J. Douglass, Esquire  
MY RIGHTS LAWYERS, LLC

Dated: \_\_\_\_\_

**GENERAL PROVISIONS AND INSTRUCTIONS FOR DISCOVERY**

- A. Whenever a request for documents is framed in the conjunctive, it also shall be taken in the disjunctive and vice versa.
- B. Whenever a request for documents is framed in the singular, it also shall be taken in the plural, and vice versa.
- C. The use of any tense of any verb shall be considered also to include within its meaning all other tenses of the verb so used.
- D. All documents produced shall be segregated and identified by the paragraphs to which they are primarily responsive. Where required by a particular paragraph of these interrogatories, documents produced shall be segregated further and identified as indicated in said paragraph. For any documents that are stored or maintained in files in the normal course of business, such documents shall be produced in such files, or in such a manner to preserve and identify the file from which such documents were taken.
- E. For each document that is responsive to these interrogatories that is sought to be withheld under a claim of privilege, the following information shall be provided:
  - (i) the place, date (or approximate date), and manner of recording or otherwise preparing the document;
  - (ii) the name and title of sender, and the name and title of recipient of the document;
  - (iii) a summary of the contents of the document;
  - (iv) the identity of each person or persons (other than stenographic or clerical assistants) participating in the preparation of the document;
  - (v) the identity of each person to whom the contents of the document heretofore have been communicated by copy, exhibition, sketch, reading or substantial summarization, the date(s) of said communication, and the employer and the title of said person at the time of said communication;
  - (vi) a statement of the basis on which privilege is claimed; and

(vii) the identity of the person or persons supplying your attorney with the information requested in subsections (i) and (vi) above.

- F. All documents produced in response to these interrogatories shall include originals and shall be produced in total notwithstanding the fact that portions thereof may contain information not requested, shall include interim as well as final editions of a document, and shall include all editions or copies of a document that are not identical to (whether due to handwritten notations, or revisions, or otherwise) the original or other produced copy of a document.
- G. These interrogatories shall be deemed to be continuing and any information secured subsequent to the filing of answers thereto, which would have been includable in the answers to these interrogatories had it been known or available, shall be supplied by Supplemental Answers as provided by the Rules of Court.
- H. In answering the interrogatories below, defendant shall furnish not only such information as is available to the particular individual(s) answering the interrogatories, but also such information as is known to each officer, employee, representative, or agent, including their attorneys, investigators, and experts.
- I. In the event that any information is sought to be withheld under a claim of privilege, provide the information requested in Paragraph I(E) above for all documents related to or reflecting the information for which a claim of privilege is asserted.
- J. Whenever in answer to these interrogatories reference is made to a conversation or oral statement, give the date and place thereof, the identity of the persons involved in the conversation or oral statement, the identity of any persons present and the substance of the conversation or oral statement.
- K. If the information called for by an interrogatory is in whole or in part contained in documents, the information may be supplied by attaching copies of the relevant documents to your answers to the interrogatories to the extent that the documents contain the information requested, as long as same is noted in narrative form in the answer to interrogatory.
- L. If there is insufficient space to answer an interrogatory, the remainder of the answer should be put on a supplemental sheet.
- M. Whenever an interrogatory requests and answer for which there is more than one answer, each answer to the interrogatory is to be set forth in detail. For example, if an interrogatory asks when plaintiff objected to the contents of a document, and plaintiff objected on more than one occasion, the answer to the interrogatory must include each occasion when plaintiff objected.

## **DEFINITIONS**

As used in this discovery request, the fully CAPITALIZED terms have the following meanings:

ADDRESS means a mailing address and a street address which includes a room, suite or apartment number, city, state and zip code;

COMMUNICATION AND COMMUNICATE refers to any instance in which information is conveyed by or between one or more PERSONS by any means, both oral and written, including telephone calls, facsimiles, transmission of DOCUMENTS, oral conversations, letters, telegrams, memoranda;

COMPLAINT means the complaint filed in the above referenced case;

CONTRACT, AGREEMENT and/or CONTRACTUAL AGREEMENT refers to any business arrangement for the supply of goods and/or services;

CUSTODIAN refers to the PERSON having possession, custody or control of any WRITING or physical evidence;

DESCRIBE or DESCRIBE IN DETAIL, STATE or SET FORTH IN DETAIL means to relate as completely as possible each and every act, omission, incident, event, condition, circumstance or thing relating directly or indirectly to the subject of the description including all pertinent dates and, without limitation to the foregoing, to identify all documents, communications, persons or locations directly or indirectly related thereto;

DOCUMENT refers to any medium used for recording and retrieving information including all writings of any kind, including the original and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and intraoffice communications, offers, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets and all drafts, alterations, modifications, changes and amendments of any of the foregoing) graphic or aural records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures) and electronic, mechanical or electric records or representations of any kind (including without limitation, tapes, cassettes, discs, or recordings, any written, typed, printed, recorded or graphic matter, however preserved, produced or reproduced, of any type or description, regardless of origin or location);

DURING THE RELEVANT TIME PERIOD refers to the year during which you first became acquainted with the plaintiff and/or the year during which the alleged occurrence as set forth in the complaint took place, until the present, unless otherwise specified in the request.

IDENTIFY means to describe a WRITING with such particularity as YOU would require in a motion to produce, or to provide the name, address and telephone number of a PERSON;

LOCATE or LOCATION means to provide a detailed physical description of exactly where a PERSON, object or event can be found or occurred, including, but no limited to, an ADDRESS;

OCCURRENCE and INCIDENT refers to the event or events as set forth and alleged in the complaint and/or the subject matter of this action;

PERSON means a natural person as well as all types of business, including associations, subsidiaries, companies, partnerships, joint ventures, corporations, trusts, estates, fictitious, governmental and public entities;

PROFESSIONAL AND/OR BUSINESS ASSOCIATION refers to any relationship, alliance, affiliation, correlation or any other connection whatsoever;

POLICY means a rule, procedure or directive, formal or informal, written or unwritten, and includes each common practice, custom and understanding of course of conduct recognized and accepted as such by YOU or by PERSONS subject to it;

SUBJECT PREMISES means the premises identified in Plaintiff's complaint as the geographic location of the incident;

WRITING means any and all handwritten material, type written material, printed material, photocopies, photographs, and every other means of recording upon any tangible thing, together with any form of communication or other representation which would constitute a WRITING within the meaning of the Rules of Evidence;

YOU and YOUR means the above-named "Responding Party" and includes your agents, employees, attorneys, advisors, and any other PERSON acting on your behalf;

When referencing or referring to documents attached to answers to interrogatories or responses to Notices to Produce or Demand for Production of Documents, *please bate stamp each page submitted and reference those numbers being referred in each answer.*

### **Initial Interrogatories to Defendant(s)**

1. Set forth:

- (a) Name, address and job title of the person answering these Interrogatories.
- (b) The date and place these Interrogatories were answered.
- (c) Whether the person certifying these answers is doing so based on his or her personal knowledge; ; and if not based on personal knowledge, identify every source upon which the person certifying these answers referred, relied or reviewed in order to certify these answers.

**ANSWER:**

2. State the names and addresses of all persons having personal knowledge of any fact relating to this case and for each person set forth:

- (a) The person's employer and occupation.
- (b) The subject matter for which each person has relevant knowledge.
- (c) Whether that person was an eyewitness to the incident or events in question.
- (d) Relationship, if any, between you and such person.

**ANSWER:**

3. State whether you have obtained Statements, in any form, from any person, regarding any of the facts related to this case.

**ANSWER:**

4. If you answered the above question in the affirmative:

- (a) Identify the person who gave such a statement.
- (b) Identify the statement, attaching a copy to your interrogatories
- (c) Identify the person who took such a statement
- (d) Identify any person present when such a statement was taken.

**ANSWER:**

- 5. State the name, occupation, business address and telephone number, residence address and telephone number of each witness you expect to call or rely upon in the trial of this action, together with a summary of the matters to be testified about within the knowledge of each such witness, and the source of the knowledge for each and every fact to be testified to by such witness.

**ANSWER:**

- 6. State the name, field of expertise, business address and telephone number of any expert witnesses who are expected to testify at trial.

**ANSWER:**

- 7. As to each person identified in response to Interrogatory #6:
  - a. Set forth the subject matter on which he or she was retained, employed or consulted;
  - b. Set forth his or her field of expertise;
  - c. Set forth in detail his or her qualifications and training including professional and practical experience, educational institutions attended, and degrees obtained. As to each item listed in the answer to this interrogatory, set forth the relevant dates and the nature and identify of each institution attended and of each place which experience or training was received;
  - d. Set forth the exact title of any article or publication written by the person relating in any way to his or her field of expertise or the subject matter of this litigation. As to

each such article or publication, identify the publisher and set forth the date and location of publication;

- e. Identify any and all written reports, conclusions or comments ever prepared by the person with respect to the subject matter of this litigation and attach copies of same;
- f. Set forth a detailed description of all oral reports, conclusions or comments ever prepared by the person with respect to the subject matter of this litigation.

**ANSWER:**

- 8. Please identify any and all policies and/or procedures and/or practices pertaining to employee performance reviews and/or employee performance and/or employee conduct in the workplace that were in place during any time period mentioned in the Complaint through the present. Please describe each such policy, procedure or practice and identify the dates of which same have been in effect.

**ANSWER:**

- 9. In regards to Interrogatory #8, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:
  - a. Name, address, sex, age, race, religion and national origin;
  - b. The dates during which each was responsible for setting such policy;
  - c. The individual's job title and employment history with the defendant.
  - d. Identify persons representing Plaintiff who participated in each communication;

**ANSWER:**

- 10. Please identify any and all policies and/or procedures and/or practices pertaining to any matter raised in the Complaint and/or pertaining to any allegation within the Complaints



that were in place during all time periods identified in the Complaint through to the present. Please describe each such policy, procedure or practice and identify the dates of which same been in effect.

**ANSWER:**

11. In regards to Interrogatory #9, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:

- e. Name, address, sex, age, race, religion and national origin;
- f. The dates during which each was responsible for setting such policy;
- g. The individual's job title and employment history with the defendant.
- h. Identify persons representing Plaintiff who participated in each communication;

**ANSWER:**

12. Please identify any and all job descriptions for the title and/or position held by the Plaintiff and/or for any and all titles and/or job assignments of Plaintiff at any time during Plaintiff's employment with Defendant.

**ANSWER:**

13. Please identify any and all supervisors and/or persons delegated with authority to supervise and/or monitor in any manner the work performed by Plaintiff for all of Plaintiff's employment.

- a. Identify the name of any such supervisor;
- b. Identify the supervisor assigned to Plaintiff and the time period for same;
- c. Identify the length and nature of the supervisory capacity;
- d. Identify whether this supervisor or these supervisors performed written evaluations of Plaintiff's work performance.

**ANSWER:**

14. Do you deny, in whole or in part, any of the paragraphs of Plaintiff's Complaint? If so, set forth and describe in detail all facts upon which you base your denial or which relate to your denial, identify all persons with knowledge of those facts, and identify all documents relating, regarding or referring to those facts. Please specify the paragraph number of Complaint to which you are referring.

**ANSWER:**

15. Please set forth, in detail, any and all reasons for any and all adverse employment actions to Plaintiff as identified in the Complaint.

**ANSWER:**

**MY RIGHTS LAWYERS, LLC**

By: Michelle J. Douglass  
Michelle J. Douglass, Esq.

Dated: \_\_\_\_\_

**CERTIFICATION**

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

Date:

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