

[REDACTED] *et ux.*  
Plaintiffs

v.

[REDACTED] *et al.*  
Defendants

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY  
\* [REDACTED]  
\* \* \* \* \*

**INTERROGATORIES**

TO: [REDACTED]

FROM: [REDACTED]

Pursuant to Maryland Rule 2-421, you are requested to serve written answers under oath to the following Interrogatories within thirty days.

**Instructions**

(a) Pursuant to Rule 2-421(b), your response shall set forth the answer to each interrogatory "separately and fully in writing under oath" or "shall state fully the grounds for refusal to answer any interrogatory." The response shall be signed by you.

(b) Pursuant to Rule 2-421(b), your answers "shall include all information available" to you "directly or through agents, representatives, or attorneys."

(c) Pursuant to Rule 2-401(e), these interrogatories are continuing. If you obtain further material information before trial, you are required to supplement your answers promptly.

(d) Pursuant to Rule 2-421(c), if you elect to specify and produce business records of yours in answer to any interrogatory, your specification shall be in sufficient detail to enable the Defendant to locate and identify the records from which the answer may be ascertained.

(e) If you perceive any ambiguities in a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering.

## Definitions

(a) "Document(s)" and "record(s)" mean writings, drawings, graphs, charts, x-rays, photographs, recordings, "paperless" and electronic files and writings, medical records, computer records, telephone logs, notes, invoices, letters, test results, memos, and other data compilations from which information can be obtained, translated if necessary by you through detection devices into reasonably usable form.

(b) "Identify," "identity," or "identification," (1) when used in reference to a natural person, means that person's full name, last known address, home and business telephone numbers, and present occupation or business affiliation; (2) when used in reference to a person other than a natural person, means that person's full name, a description of the nature of the person (e.g., corporation, partnership, etc.), and the person's last known address, telephone number, and principal place of business; and (3) when used in reference to a document, requires you to state the date, the author (or, if different, the signer or signers), the addressee, and the type of document (e.g. letter, memorandum, chart, etc.) or to attach an accurate copy of the document to your answer, appropriately labeled to correspond to the interrogatory.

(c) "Person" includes an individual, entity, general or limited partnership, joint stock company, unincorporated association or society, municipal or other corporation, incorporated association, limited liability partnership, limited liability company, the State, an agency or political subdivision of the State, a court, and any other governmental entity.

(d) "You," "your" and "Plaintiff" mean the person to whom these interrogatories are addressed and all of that person's agents, representatives, or attorneys.

(e) "Communication(s)" means letters, written correspondence, verbal conversations by telephone and in person, e-mails, electronic correspondence, facsimiles, meetings, conferences, and each and every mode of verbal and written communication.

(f) "Complaint" means the operative Complaint, as well as any Counter, Cross or Third Party Complaint filed in the captioned case.

(g) [REDACTED] means [REDACTED], and/or any of their agents, employees, representatives, principals and/or attorneys.

(h) [REDACTED] means [REDACTED], and any or all of the agents, employees, representatives, and/or attorneys of the law firm, including but not limited to [REDACTED]e.

(i) The "Accident" means the accident on or about August 12, 2003.

(j) The "Tort Action" means the case of [REDACTED]  
*et al.*

(i) "Health care provider(s)" means a hospital or related institution, a physician, an osteopath, an optometrist, a chiropractor, a nurse, a dentist, a podiatrist, a psychiatrist, a psychologist, a clinic, a social worker, substance abuse professional, a physical therapist and/or any other provider of health care or mental health care, consultation, diagnosis or treatment.

### INTERROGATORIES

**INTERROGATORY NO. 1:** Identify each person, other than a person intended to be called as an expert witness at trial, having discoverable information that tends to support a position that you have taken or intend to take in this action, including any claim for damages, and state the subject matter of the information possessed by that person.

**INTERROGATORY NO. 2:** Identify each person whom you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the findings and opinions to which the expert is expected to testify and a summary of the grounds for each opinion, and attach to your answers any written report made by the expert concerning those findings and opinions.

**INTERROGATORY NO. 3:** If you intend to rely on any documents or other tangible things to support a position that you have taken or intend to take in the action, including any claim for damages, provide a brief description, by category and location, of all such documents and other tangible things, and identify all persons having possession, custody, or control of them.

**INTERROGATORY NO. 4:** Itemize and show how you calculate any and all economic damages claimed by you and describe any non-economic damages claimed by you in this action.

**INTERROGATORY NO. 5:** Identify any written statements signed by any party or by any agent, principal, representative or employee of any party to this action that refers or relates in any way to the matters alleged in the Complaint.

**INTERROGATORY NO. 6:** Identify all persons who have given you written statements or oral statements reduced to written form that refer or relate in any way to the matters alleged in the Complaint.

**INTERROGATORY NO. 7:** Identify and set forth the terms all releases, settlements, agreements or contracts of any kind which you have entered into with any person(s) that refer or relate, in any way, to the matters alleged in the Complaint or to the Accident.

**INTERROGATORY NO. 8:** Set forth in detail each and every action or omission by Muher that you contend caused you damage or injury and all facts and circumstances that support your contention that the act or omission caused injury or damage.

**INTERROGATORY NO. 9:** Set forth in detail each and every action or omission by [REDACTED] that you contend caused you damage or injury and all facts and circumstances that support your contention that the act or omission caused injury or damage.

**INTERROGATORY NO. 10:** If you contend that [REDACTED] acknowledged liability or fault as to any of the allegations in the Complaint, state the date, time and place of each such

acknowledgment, the name of the person making the same, the person to whom made and whether the statement was oral or written.

**INTERROGATORY NO. 11:** Identify every person with personal knowledge regarding the Accident.

**INTERROGATORY NO. 12:** Identify the issuer, bank, and account number of the credit cards and/or bank debit cards that you use for purchases from 2003 to 2006.

**INTERROGATORY NO. 13:** Set forth all actions and/or omissions by [REDACTED] individually or doing business as [REDACTED] that you contend caused or contributed to causing the Accident.

**INTERROGATORY NO. 14:** Set forth all actions and/or omissions by [REDACTED] individually or doing business as [REDACTED] that you contend caused or contributed to causing the Accident.

**INTERROGATORY NO. 15:** Set forth all actions and/or omissions by [REDACTED] [REDACTED] agents that you contend caused or contributed to causing the Accident.

**INTERROGATORY NO. 16:** Set forth all actions and/or omissions by [REDACTED] agents that you contend caused or contributed to causing the Accident.

**INTERROGATORY NO. 17:** Set forth your understanding regarding [REDACTED] assuring you that the Tort Action would be filed in the proper jurisdiction.

**INTERROGATORY NO. 18:** Set forth your understanding regarding [REDACTED] being lead counsel in the Tort Action, based on their expertise in construction accident litigation.

**INTERROGATORY NO. 19:** Identify all of your employer(s) from 1996 to 2006, and state your dates of employment, position, wages, supervisor's name and the reason for the termination of your employment.

**INTERROGATORY NO. 20:** State your annual income for each year from 1996 to 2006.

**INTERROGATORY NO. 21:** Identify all health care providers who treated, diagnosed, evaluated, or consulted with you concerning your accident on or about August 9, 2002.

**INTERROGATORY NO. 22:** Identify all health care providers who treated, diagnosed, evaluated, or consulted with you concerning your accident on or about August 14, 2001.

**INTERROGATORY NO. 23:** Identify all health care providers who treated, diagnosed, evaluated, or consulted with you concerning your car accident on or about May 21, 1998.

**INTERROGATORY NO. 24:** Identify all health care providers who treated, diagnosed, evaluated, or consulted with you for any reason from January 1, 2000, to the present.

**INTERROGATORY NO. 25:** Set forth the substance and date of each communication that you had with [REDACTED] that refers or relates to the jurisdiction in which to file the Tort Action, and identify all persons with knowledge of these communications.

**INTERROGATORY NO. 26:** Set forth the substance and date of each communication that you had with [REDACTED] that refers or relates to the statute of limitations on the Tort Action and identify all persons with knowledge of these communications.

**INTERROGATORY NO. 27:** Set forth the substance and date of each communication that you had with [REDACTED] that refers or relates to when the Tort Action would be filed and identify all persons with knowledge of these communications.

**INTERROGATORY NO. 28:** If you were a party to any other claim, suit, complaint, action, demand for compensation, disability proceeding, bankruptcy, worker's compensation action, proceeding, or claim of any kind, whether or not filed in a tribunal (other than the captioned claim), from January 1, 2000, to the present, state the case/claim name, the parties, the court, if any, the case/claim number, your attorney and how the matter was resolved.

**INTERROGATORY NO. 29:** Set forth the facts and circumstances of every criminal charge, action or investigation, concerning you, since turning 18 years of age, and identify the Court, case/claim name and number, your attorneys, and how the matter was resolved.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Served: March 26, 2007