

Samples

1 PAUL SAMPLE
2 123 ANYSTREET
3 SACRAMENTO, CA. 95814
4 916-555-1234
5 Defendant, In Pro Per

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7
8
9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF SACRAMENTO

11 ACME, INC.)
12 Plaintiff(s))
13 vs.) Parties' names)
14 PAUL SAMPLE)
15 Defendant(s))

16
17 PROPOUNDING PARTY: PAUL SAMPLE
18 RESPONDING PARTY: ACME, INC.
19 SET NUMBER: ONE (1)

20 To Plaintiff, Acme, Inc. and to its attorney:
21 Defendant, Paul Sample, requests that Plaintiff, Acme, Inc. respond to the following
22 interrogatories separately and fully in writing and under oath, pursuant to Section 2030.010 et
23 seq. of the Code of Civil Procedure, and that the response be signed by them
24 and be served on Defendant, Paul Sample within 30 days (35 days if they were
25 served by mail within California) from the date of service.

26 In answering these interrogatories, furnish all information that is available to you. If you
27 cannot answer an interrogatory completely, answer it to the extent possible. If you do not have
28 personal knowledge sufficient to respond fully to an interrogatory, so state, but make a
reasonable and good faith effort to obtain the information by inquiry to other natural persons or
organizations, unless the information is equally available to the propounding party.

Case No.: 34-2010-00099999

DEFENDANT PAUL SAMPLE'S SPECIAL
INTERROGATORIES TO PLAINTIFF
ACME, INC
SET ONE

Case number.

Name and party designation of party making these requests.

Name and party designation of party responding to these requests.

Set number.

The "propounding party" is the party asking the questions.

Responding party.

These instructions must appear at the beginning of your Special Interrogatories.

1
Special Interrogatories

Special Interrogatories (page 1)



Define terms that will be used throughout the interrogatories. Be as specific as possible. Consider using the definitions found in the Form Interrogatories, if appropriate. In your Interrogatories, any term for which you have provided a definition should be written in all capital letters, to indicate that you are using the term as defined.

1 DEFINITIONS:

2 ACCIDENT means the motor vehicle accident of May 2, 2007 alleged in the Plaintiff's
3 Complaint.

4
5 Interrogatory No. 1:

6 What was the weather at the time of the ACCIDENT?

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8 Interrogatory No. 2:

9 How fast was Acme, Inc.'s delivery truck traveling in the moments just prior to the ACCIDENT?

10
11 Interrogatory No. 3:

12 At the time of the ACCIDENT was the driver of the delivery truck owned by Acme, Inc. talking
13 on a cellular phone?

14
15 Interrogatory No. 4:

16 During the year prior to the ACCIDENT, were there any complaints made by any individual or
17 entity to the Plaintiff regarding the driving of the Acme, Inc. driver involved in the ACCIDENT?

18
19 Interrogatory No. 5:

20 Describe any and all times within the last year that the delivery truck involved in the
21 ACCIDENT owned by Acme, Inc. was serviced or maintained, including the dates of the service
22 and a description of the services performed.

23
24 By: _____
25 Paul Sample, Defendant, In Pro Per

Each question is numbered sequentially. Whenever you use a term for which you've provided a definition, type the term in all capital letters.

Each question should establish a point you need to prove your case or disprove a point the other side must establish to win theirs. All questions must be reasonably calculated to discover relevant admissible evidence.

Your questions may not contain subparts, and may not or be compound, conjunctive or disjunctive. Do not include any continuing interrogatories. Consult the resources listed in this Guide for sample interrogatory questions.

The downloadable template includes space for five interrogatories. Delete those you do not use, or add more if needed, keeping in mind the limits described at the beginning of this Guide.

Special Inter

Special Interrogatories (page 2)