Discovery: Responding to Interrogatories

Interrogatories are written questions sent by one party to another, which the responding party must answer under penalty of perjury. Interrogatories allow the parties to ask who, what, when, where and why questions, making them a good method for obtaining new information.

Templates and Forms

- Response to Interrogatories Template – DOCX (https://saclaw.org/wp-content/uploads/2026/02/sbs-discovery-responding-to-interrogatories-responses.docx)
- Proof of Service by First Class Mail (POS-030) (http://www.courts.ca.gov/documents/pos030.pdf)

There are two types of interrogatories: form interrogatories and special interrogatories. You may receive one or both types of interrogatories in your case. If you receive both, they will need to be answered separately.

Related Discovery Guides

Visit our Discovery topic page (https://saclaw.org/legal_topic/discovery-process-to-get-evidence-from-other-side/#research_guides) for a complete list of our discovery guides and videos.

Although these interrogatories look very different, the responses to both are similar. Your answers must be as complete and straightforward as possible (California Code of Civil Procedure (CCP) § 2030.220 (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=2030.220.&lawCode=CCP)), and be accurate to the best of your knowledge. In addition, your responses must be “verified,” meaning that you must sign under penalty of perjury that your responses are true and correct (CCP § 2030.250 (http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=2030.250.&lawCode=CCP)).

You have 30 days after the form or special interrogatories were served to you (35 days if served by mail from within California) to serve your responses to the interrogatories.

Sometimes, rather than answering the interrogatory, you may wish to object to the request on legal grounds. Common objections include:

The request is impermissibly compound. The propounding party may ask you to answer only one question with each interrogatory. You may object to any request that asks you to answer two or more different questions in a single request. For example, “Please provide the names of all witnesses to the ACCIDENT, and where they were located at the time of the ACCIDENT,” is impermissibly compound. It is asking you to answer two separate questions: the names of witnesses, and the location of witnesses at the time of the accident.

The request is vague, ambiguous or unintelligible. Sometimes, it is impossible to determine what the propounding party is asking you. In these situations, you may object to the request on the grounds that it is vague, ambiguous or unintelligible. For example, in a case involving a bank account, the question “On what dates did you send statements?” could be considered vague and ambiguous, because it does not specify the type of statement, the account for which statements were sent, or the time period during which the statements were sent. An unintelligible interrogatory is one that makes no sense, often as a result of improper use of cut-and paste, or other difficulties in constructing a cohesive sentence.

The request is not reasonably calculated to lead to the discovery of relevant, admissible evidence. All interrogatories must be relevant to the issues in the case. If a request is not likely to lead to the discovery of relevant, admissible evidence, you may object. For example, in a car accident case, if the propounding party asks: “Please list the names and addresses of all of your employers over the past 10 years,” you may wish to object to the request. Unless you are seeking loss of income or future income where your past employment is relevant to determine likely employment in the future, or unless your past employment is somehow related to the accident, this request is not likely lead to relevant evidence in the case.

There are many other objections that may be raised in your responses. See the resources listed at the end of this Guide for more information.

Step-by-Step Instructions

1 Carefully Review All the Requests

Review each request to ensure you fully understand the question, and can answer it completely. Be sure to review all the information, documents, and other evidence available to you before

answering, to ensure that your responses are accurate and thorough. You may need to research the objections you wish to raise.

2 Complete Your Responses to the Interrogatories

Immediately after the top caption, your response must include the name of the requesting party, the responding party, and the set number of the request. You must respond to each request individually. You do not need to repeat the text of the question, but your responses must be in the same order as the requests, and each response should be labeled with the same number or letter as the request.

There is no Judicial Council form for this procedure. Instead, the relevant document must be typed on 28-line pleading paper. A customizable template may be downloaded from this link:

- Response to Interrogatories (https://saclaw.org/wp-content/uploads/2026/02/sbs-discovery-responding-to-interrogatories-responses.docx)

A sample response is available at the end of this Guide.

3 Make Photocopies

Make one photocopy of your response for yourself and one for each party in the case, other than the propounding party.

4 Have Your Responses Served

The **original** of your response document must be served on the attorney for the propounding party or directly on the party if self-represented (*in pro per)*. Courtesy copies should be served on all other attorneys or self-represented parties in the case. Service may be completed by mail, by a person over the age of 18 who is not a party to the case. The person serving your responses must complete a proof of service form, typically a *Proof of Service by First Class Mail* (POS-030) (http://www.courts.ca.gov/documents/pos030.pdf). For more information, see our guide on Proof of Service by Mail (https://www.saclaw.org/resource_library/serving-documents-by-mail/).

5 Retain Your Documents

A photocopy of your responses and the original signed Proof of Service should be retained for your records. If the other party claims you did not respond, you may use these documents to defend yourself against a Motion to Compel. For more information, see our guide on Motions to Compel (https://www.saclaw.org/resource_library/motion-to-compel-discovery-responses/) .

For More Information

On the Web

Introduction to Discovery – Part 5: Responding to Form Interrogatories
(https://www.saclaw.org/video-library/discovery-5-form-interrogatories/)
Part 5 of this video series from the Sacramento County Public Law Library's Civil Self Help Center will help you understand how to respond to Form Interrogatories.

Introduction to Discovery – Part 7: Responding to Special Interrogatories
(https://www.saclaw.org/video-library/discovery-7-response-to-special-interrogatories/)
Part 7 of this video series from the Sacramento County Public Law Library's Civil Self Help Center will help you understand how to respond to Special Interrogatories.

At the Law Library

California Civil Discovery KFC 1020 .H64
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

California Civil Discovery Practice KFC 1020 .C35
Electronic Access: On the Law Library's computers, using *OnLaw.*

California Civil Litigation and Discovery KFC 995 .G674

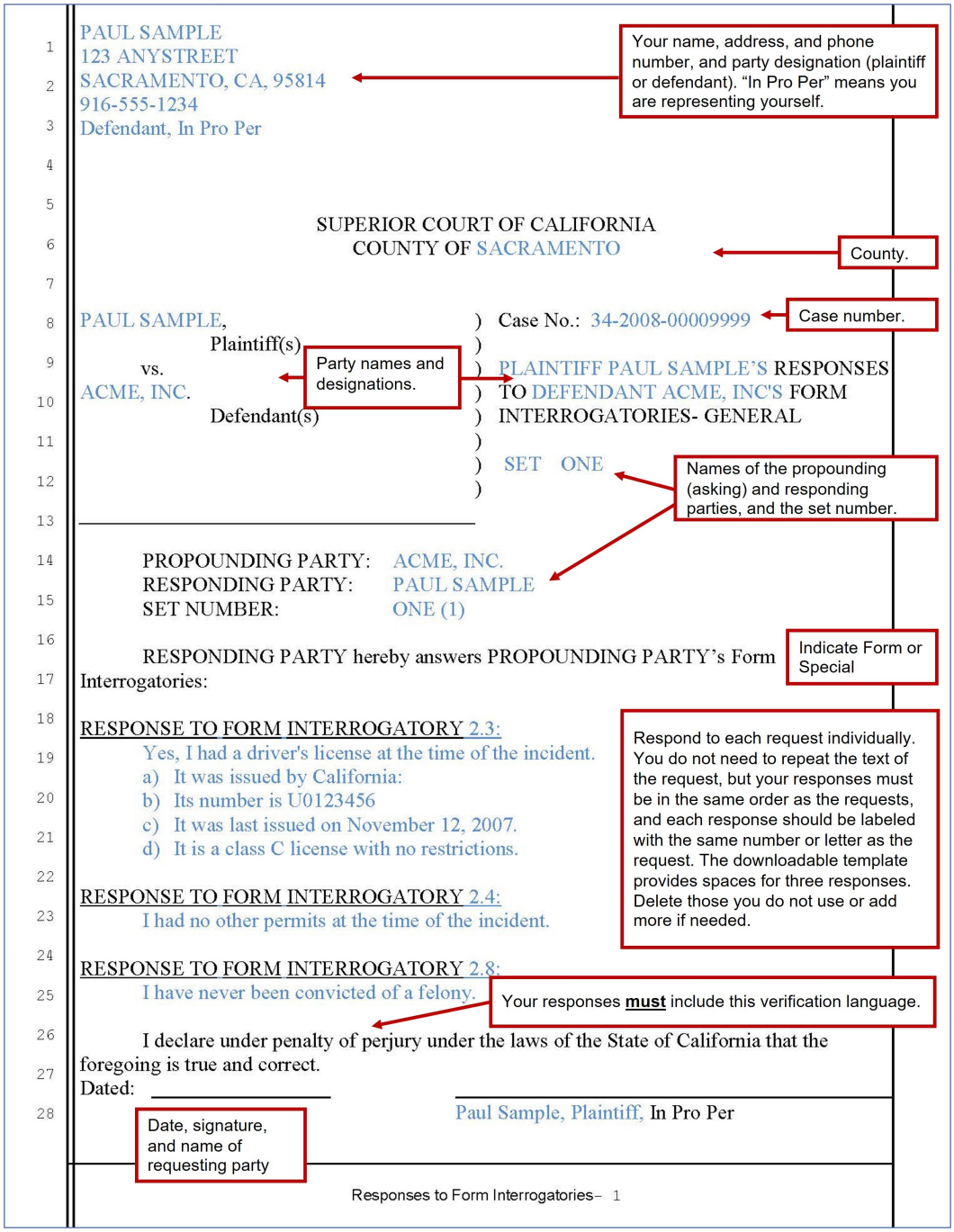
California Deposition and Discovery Practice KFC 1020 .D44
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

California Discovery Citations KFC 1020 .F56

California Practice Guide: Civil Procedure Before Trial KFC 995 .W45

Matthew Bender Practice Guide: California Civil Discovery KFC 1020 .M37
Electronic Access: On the Law Library's computers, using *Lexis Advance.*

Samples



Response to Interrogatories

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