

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

FRANKIE PLOWER,

Plaintiff,

v.

MILDRED DANDERDORF,

Defendant.

Case Type: Contract

Court File No.: xx-CV-xx-xxx

**DEFENDANT MILDRED
DANDERDORF'S FIRST SET OF
INTERROGATORIES TO
PLAINTIFF FRANKIE PLOWER**

DEFENDANT'S INTERROGATORIES TO PLAINTIFF

PLEASE TAKE NOTICE that Defendant, Mildred Danderdorf, hereby requests the Plaintiff, Frankie Plower, answer the following Interrogatories, in writing and under oath, within thirty (30) days, pursuant to Rule 26 and Rule 33 of the Minnesota Rules of Civil Procedure:

DEFINITIONS

1. The words "plaintiff", "you", and "your" refer to the party or parties to whom these Interrogatories are directed and all other persons acting on behalf of such party, including, but not limited to, attorneys and their associates, investigators, agents, employees, representatives, and others who are in possession of or who may have obtained information for or on behalf of this answering party.
2. The word "person" refers to any natural person and any association, joint venture, partnership, corporation or other legal or business entity.
3. The word "identify" when used in reference to a natural person means that you shall state the following information:
 1. Full name;

2. Age;
3. Current or last known address and telephone number;
4. Current or last known employer and position with employer.

INTERROGATORIES

1. Please state your full name, address, date of birth, social security number, and marital status.

2. State the names, addresses and telephone numbers, if known, of all persons whom:
 - a. You believe to have been at the scene of the occurrence immediately before, at the time of, or immediately subsequent to the occurrence referred to in the Complaint.
 - b. You believe to have knowledge of the facts of the occurrence and/or injuries referred to in the Complaint.

3. Please identify the motor vehicle you were operating at the time of your collision with the Defendant, including its make, year, registration number, and registered owner.

4. Please state the total dollar amount of damage done to your vehicle as a result of the accident herein.

5. Please list all injuries that were sustained by you as a result of the automobile accident, which is the subject matter of this litigation.

6. On the date of the accident above-mentioned, please state the destination from which you left prior to the accident and the destination you were going at the time and place of the accident:
 - a. List each place Plaintiff had been in the four-hour period before the collision.

7. Identify all person who have knowledge or information relating to the personal, social, vocational, recreational, educational or other background of the Plaintiff known to you, whether obtained in the course of investigation, preparation for trial or otherwise.
8. Did you have any disability or medical condition at the time of the accident, within one year preceding or within 6 months subsequent to the date of the accident? If so, please describe said disability or condition.
9. Describe in detail the manner in which the occurrence alleged in the Complaint occurred.
10. Were you taking any medication or prescribed any medication within 6 months prior or 6 months after the accident, and if so, state the name of the drug and the dosage taken in the 12 hours preceding the occurrence?
11. Had you taken any alcoholic beverage or mood altering drugs within twenty-four (24) hours prior to the accident? If so,
 - a. Please state the names of all alcoholic beverages or drugs consumed.
 - b. Please explain the exact amount of alcoholic beverages or drugs taken.
 - c. Please state the exact times that such beverages or drugs were taken.
12. Prior to the accident in this matter had you ever been given any prescription for corrective lenses to correct any deficiencies in your vision? If yes,
 - a. Please state the last prescription that was given for each of your eyes prior to the accident.
 - b. Please state the type of lenses that you typically wore prior to the accident (contact lenses or glasses).
 - c. Were you wearing any type of corrective lenses at the time of the accident?
13. Relate in detail all conversations which took place at the time of, prior to, or following the occurrence alleged in the Complaint, identifying the persons involved in such conversations and the identity of all persons known to you who overheard or may have overheard such conversations.

14. Identify all persons whom you may call at trial to give testimony in the form of expert opinions or conclusions and, for each such person, state the following:
 - a. Full name, address and occupations.
 - b. The subject matter to which he or she may be asked to give expert testimony.
 - c. His or her qualifications to give expert testimony on that subject or subjects.
 - d. All facts as to which the expert will testify.
 - e. All opinions or conclusions to which the expert will testify.
 - f. The grounds for those opinions or conclusions.

15. List all automobile accidents in which you were involved prior to the occurrence alleged in the Complaint, specifically stating when, where and how each accident occurred.

16. At the time of the occurrence, did you own a cell phone? If your answer is in the affirmative; please state the name, address, phone number of your service provider and account number, whether you had the phone with you at the time of the occurrence, and whether you were talking on the cell phone immediately before, at the time of, and/or immediately after the occurrence.
17. State whether you have ever been convicted of a felony or a crime involving truth or honesty. If yes, please state the following:
 - a. in what jurisdiction;
 - b. the charge;
 - c. the sentence received.

These Interrogatories are continuing in nature and it is specifically demanded that all information coming to your attention subsequent to the completion of your answers to these Interrogatories be promptly made available to Defendant's attorneys. You should take notice that Defendant will object at trial to the introduction of evidence regarding any matters inquired of on these Interrogatories if they are not revealed in a timely manner.

Date: July ____, 2010

Mildred Danderdorf
Respectfully Submitted By Her Attorney,

By: _____

L.L. Esquiremo
Attorney #xxxxxx
LegalLanding Law Offices
1050 East Law Boulevard
Minneapolis, MN 55402
(612) xxx-xxxx

ATTORNEYS FOR DEFENDANT

Certificate of Service

I hereby certify that a true copy of this document was sent, postage prepaid, to Slickson & Portman, 19 East Legal Way, Minneapolis, Minnesota 55402 on the __ day of July, 2010:
