

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
IN THE COURT OF COMMON PLEAS OF PHILADELPHIA**

PLAINTIFF(S) v. DEFENDANT(S)	CIVIL TRIAL DIVISION Compulsory Arbitration Program COURT TERM: NO.
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Plaintiff(s) Interrogatories Directed To Defendant(s)

Premises Liability Cases

Plaintiff hereby makes demand that the Defendant(s) answer the following Interrogatories pursuant to the Pennsylvania Rules of Civil Procedure 4001 et seq. These Interrogatories must be answered as provided in Pa. R.C.P. 4006 and the Answers must be served on all other parties within thirty (30) days after the Interrogatories are deemed served.

These Interrogatories are deemed to be continuing as to require the filing of Supplemental Answers promptly in the event Defendants or their representatives (including counsel) learn additional facts not set forth in its original Answers or discover that information provided in the Answers is erroneous. Such Supplemental Answers may be filed from time to time, but not later than 30 days after such further information is received, pursuant to Pa. R.C.P. 4007.4.

These Interrogatories are addressed to Defendants as a party to this action; Defendants' answers shall be based upon information known to Defendants or in the possession, custody or control of Defendants, their attorney or other representative acting on their behalf whether in preparation for litigation or otherwise. These Interrogatories must be answered completely and specifically by Defendants in writing and must be verified. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to answer each interrogatory as completely as possible. The omission of any name, fact, or other item of information from the Answers shall be deemed a representation that such name, fact, or other item was not known to Defendants, their counsel, or other representatives at the time of service of the Answers.

BACKGROUND

1. Please identify if you are an individual, corporation or partnership:

(a) If an individual:

(1) full name (maiden name, if applicable)

(2) alias(es)

(3) date of birth

(4) residence and business addresses at time of the alleged accident and currently.

(b) If a corporation:

(1) registered corporation name

(2) principal place of business

(3) registered address at the time of the alleged accident and currently.

(c) If a partnership:

(1) registered partnership name

(2) principal place of business

(3) registered address at the time of the alleged accident and currently

(4) the identities and residence addresses of each partner at the time of the alleged accident and currently.

2. Has a claim been made or a lawsuit filed against you for personal injury involving the location of the alleged accident within the last 10 years? If so, state:

(a) By whom;

(b) The Commonwealth or State, County, Court, Term and Number of any lawsuits arising from that cause of action;

(c) The outcome of the claim/lawsuit.

3. Have you been convicted of or pleaded guilty or nolo contendere to any crime(s) in the past ten (10) years to any crime(s) involving dishonesty or false statements as provided in Pa.R.E. 609, or has last date of confinement for said crime(s) been within the past ten (10) years?

4. Identify:
 - (a) Your applicable insurance carrier at the time of the alleged accident;
 - (b) Your applicable liability insurance coverage limits at the time of the alleged accident;
 - (c) Your applicable umbrella and/or excess liability insurance coverage limits at the time of the alleged accident;
 - (d) If self-insured, for all or any monetary part of a liability claim, so state (including the limits).

ACCIDENT INFORMATION

5. At the time of the alleged accident, was the location of the alleged accident possessed, controlled and/or maintained by the defendant(s)? If not, identify who did possess, control and/or maintain them.
6. Is the location of the alleged accident owned or leased by the defendant(s)? If leased, state:
 - (a) From whom said location of the alleged accident are leased;
 - (b) Dates of said lease.
7. Identify the person(s), including name, title, residence and business address(es), who last maintained and/or cleaned the location of the alleged accident.
8. State the name, home and business addresses of the following:
 - (a) Those who actually witnessed the alleged accident;

- (b) Those who were present at or near the scene at the time of the alleged accident;
 - (c) Those who have any knowledge or information as to any facts pertaining to the circumstances and/or manner of the happening of the alleged accident and/or the nature of the injuries sustained in the alleged accident;
 - (d) The person(s) who last examined/inspected the place where the alleged accident occurred before the alleged accident;
 - (e) The person(s) who last examined/inspected the place where the alleged accident occurred after the alleged accident;
 - (f) Are any of the people listed in the preceding answers to interrogatories relatives, agents, servants, employees, the spouse, and/or representatives of the Defendants(s)?
9. At the time of the alleged accident or immediately thereafter, did you have any conversation(s) with or make any statement(s) to any of the parties or witnesses, or did any of them make any statement(s) to you or in your presence? If so, state the substance of any such conversation(s) or statement(s) and identify in whose presence it/they occurred.
10. Did Defendant, or anyone acting on behalf of the Defendant, receive any reports or complaints from any source during the six (6) months prior to the alleged accident, concerning the conditions of the location of the alleged accident? If so, state:
- (a) When;
 - (b) From who received;
 - (c) The nature of each such report or complaint;
 - (d) Any action(s) taken by defendant in response thereto;
 - (e) The name, address and job title of the person(s) who has custody, possession and/or control of such reports or complaints.

11. Were any repairs or changes made to the location of the alleged accident after the accident occurred? If so, state:
 - (a) When they were made;
 - (b) The kind of repairs or changes made;
 - (c) Who made such repairs or changes;
 - (d) Whose decision it was to initiate the repairs or changes.

12. State any violations of City Ordinances or Codes for which Defendant or anyone acting on Defendant's behalf were cited regarding the alleged accident as well as the dates of said violations.

13. Were there any signs, barriers or anything else at or near the scene of the alleged accident warning of the conditions existing thereon? If so, state:
 - (a) When said warnings were placed at the scene and by whom;
 - (b) Describe exactly what the warning was and the exact dimensions of said warning;
 - (c) The exact location of said warning.

14. Do you know of anyone who is in the possession, custody and/or control of any photographs, sketches, reproductions, charts, maps or diagrams of the scene of the accident? If so, state:
 - (a) The date(s) they were taken or made;
 - (b) The name, title, residence and business address of the person(s) taking them and in the possession, custody and/or control of them;

- (c) The subject or object of the particular site or view of each of them.
15. Was any videotaping performed on the day of this alleged accident at the location where the alleged accident occurred? If so, state:
- (a) Whether there is any type of log, record, compilation or other documentation of the videotaping performed;
 - (b) Who has custody, possession and/or control of the recording(s).
16. What were the weather conditions on the day of and the day before the alleged accident?
17. Do you allege that the weather conditions contributed to the happening of Plaintiff(s) alleged accident?
18. Do you believe the Plaintiff did anything to contribute to the alleged accident? If so, describe what actions contributed to the alleged accident.

MISCELLANEOUS

19. If you have engaged, or expect to engage, healthcare professionals and/or other expert witnesses (e.g. accident reconstructionists), whom you intend to have testify or whose report you intend to submit at trial on your behalf on any matter pertaining to this action, state:
- (a) The name of the expert;
 - (b) The expert's professional address;
 - (c) The expert's occupation;
 - (d) The expert's specialty;
 - (e) The expert's qualifications (e.g. Curriculum Vitae);

- (f) The topic or subject matter upon which expert is expected to testify;
 - (g) The substance of the facts to which the expert is expected to testify;
 - (h) The substance of the opinion to which the expert is expected to testify;
 - (i) A summary of the grounds for each opinion the expert is expected to testify.
20. Have you, your attorney or any representative of yours, conducted any sound, photographic, motion picture film, personal sight or any other type of surveillance of the Plaintiff(s)?
21. From the time of the accident to the present have you had or do you have any social media accounts such as Facebook, Instagram, Twitter, etc? If so, identify all of your social media accounts.
22. State the name and address of the person answering these Interrogatories and his/her relationship to the Defendant.

Esquire
Attorney ID#:

I _____, subject to the penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities, state the attached answers and/or documents are submitted in response to the foregoing Interrogatories and/or Requests for Production of Documents and that to the best of my knowledge, information and belief they are true and complete.

Signature