

## Personal Injury Litigation Interrogatories

1. Give the name and present or last-known residential and employment address and telephone number of each eyewitness to the incident which is the subject of the litigation.
2. Give the name and present or last-known residential and employment address and telephone number of each person who has knowledge of the facts relating to the litigation.
3. Give the names of all persons who have been interviewed in connection with the above litigation, including the names and present or last-known residential and employment addresses and telephone numbers of the persons who made said interviews and the names and present or last-known residential and employment addresses and telephone numbers of persons who have the original and copies of the interview.
4. Identify all photographs, diagrams, or other representations made in connection with the matter in litigation, giving the name and present or last-known residential and employment address and telephone number of the person having the original and copies thereof. (In lieu thereof, a copy can be attached.)
5. Give the name, professional address, and telephone number of all expert witnesses presently retained by the party together with the dates of any written opinions prepared by said expert. If an expert is not presently retained, describe by type the experts whom the party expects to retain in connection with the litigation.
6. Give a brief description of any insurance policy, including excess coverage, that is or may be applicable to the litigation, including:
  - (a) The name and address of all companies insuring the risk;
  - (b) The policy number(s);
  - (c) The type of insurance;
  - (d) The amounts of primary, secondary, and excess coverage.
7. (Additional interrogatory to be answered by a personal injury litigation plaintiff only) Give the name, professional address, and telephone number of all physicians, chiropractors, psychologists, and physical therapists who have examined or treated you at any time during the ten year period immediately prior to the date of the incident at issue in this litigation.