

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

PROBATE AND FAMILY COURT
NO. xxxx150000

JOHN DOE,)
Plaintiff)
)
VS.)
)
JANE DOE,)
Defendant)

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO THE DEFENDANT

Pursuant to Massachusetts Domestic Relations Procedures, JOHN DOE ("Plaintiff") requests that JANE DOE ("Defendant") answer the following Interrogatories within thirty (30) days as required by law.

In answering the attached interrogatories, furnish all information that is available to you, including all non-privileged information in the possession of your attorney(s), or investigators for your attorneys, and any others employed by you or on your behalf and not merely such information known to you as a matter of personal knowledge. Any reference made to "you" includes every person in connection with you as Responding Party, including all agents, investigators, employees and other persons acting on your behalf.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure information to do so, so state, and answer each interrogatory to the fullest extent possible. Specify why you were unable to answer the remainder of any interrogatory. Finally, state whatever information or knowledge you have concerning the unanswered portions of any interrogatory.

If an interrogatory does not specifically request a particular fact and such fact(s) is necessary to make the answer to the interrogatory comprehensive, complete or not misleading, you shall include such facts as part of your answer. The interrogatory shall be deemed specifically to request such fact(s).

In each instance where Responding Party claims insufficient knowledge or information as a ground for not providing information or for providing only a portion of the information requested, a description must be provided of the efforts made to locate the information necessary for the answer.

I. DEFINITIONS

1. "DESCRIBE" and "SPECIFY" and "EXPLAIN" and/or "STATE" shall mean to set forth fully and unambiguously, using technical terms or words of art necessary, each and every fact and event relevant to the answer called for in the interrogatory, and if which the defendants or agents, representatives, attorneys, and all other persons acting for, or on behalf of, the Responding Party has knowledge.

2. "IDENTIFY" when referring to an individual, means to state: His/her full name; his/her present address if known or last known address if present address is unknown; and, his/her home and business telephone number.

3. "IDENTIFY" when referring to a document means to state: The type of document (e.g. letter, record, journal, memorandum), the date, title and identifying number of the document, if any, the general subject matter of the document, and the present location of the document.

4. The term "DOCUMENT" or "DOCUMENTS" shall mean to refer to all writings, as that term defined in Evidence Code section 250, and shall specifically include, but is not limited to, the original and all copies of any written material, including agreements, contracts, communications, correspondence, memos, telegrams, facsimiles, memorandum, notebooks, and summaries or records of telephone conversations, personal conversations and interviews.

5. "PERSONS" and/or "INDIVIDUAL" shall mean any individual, partnership, firm, corporation, trust, association, commission, board, proprietorship, authority, governmental agency or entities, and also where relevant, individuals representing such "PERSON" or "INDIVIDUAL."

6. The term "YOU" and "YOUR" shall mean JANE DOE and any attorneys, agents, employees and investigators of JANE DOE.

7. The term "PLAINTIFF" means JOHN DOE or anyone acting or purporting to act on his behalf.

8. The term "DEFENDANT" and "RESPONDING PARTY" means JANE DOE or anyone acting or purporting to act on her behalf.

9. The term "CONCERNING" means relating to, referring to, describing, evidencing or constituting.

10. The term "PERSON" means any individual, corporation, partnership, limited partnership, joint venture, sole proprietorship, trust, governmental agency or other organization recognizable at law, and its agents and employees.

11. The term "COMMUNICATION(S)" means any transfer of information of any kind, orally, in writing or in any other manner.

12. "RELATIONSHIP" refers to any association whether formal, informal, romantic or unromantic, friendships, and acquaintanceships.

II. INSTRUCTION

Answer each question below completely. With respect to any Interrogatory, if the response to which YOU contend is in some way "burdensome" or "oppressive," please STATE the specific reasons for this objection.

III. INTERROGATORIES

1. STATE each and every income source that YOU had in 2014.
2. DESCRIBE what happened on the evening of April 15, 2015.
3. IDENTIFY each and every person you live with.

Respectfully submitted,
Attorney for the Plaintiff,

XXXX, Esq.
Address
Phone
Bar No.

DATED: _____