

**IN THE CIRCUIT COURT OF THE \_\_\_\_\_ JUDICIAL CIRCUIT  
IN AND FOR \_\_\_\_\_ COUNTY, FLORIDA  
CIVIL DIVISION**

\_\_\_\_\_

Plaintiff,

v.

Case Number:

\_\_\_\_\_, and

\_\_\_\_\_

Defendants.

\_\_\_\_\_ /

**NOTICE OF SERVICE OF INTERROGATORIES**

Plaintiff, \_\_\_\_\_ (hereinafter "Plaintiff" unless otherwise specifically indicated), by and through her undersigned counsel, hereby gives notice pursuant to Fl. R. Civ. P. 1.340 that an original of the Interrogatories numbered 1 (one) through 20 (twenty), directed to the Defendant, \_\_\_\_\_, was served upon said Defendant together with a copy of this Notice.

Said Interrogatories are to be answered under oath by the Defendant to whom directed and the answers are to be given in writing immediately following the questions to which it responds, and thereafter copies of said answers are to be served upon all parties in this action in accordance with the applicable Rules of Civil Procedure, within forty five (45) days of service.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished along with the Complaint, Request to Produce, and Request for Admissions.

\_\_\_\_\_  
**George C. Andriotis, Esquire**  
Florida Bar Number: 35260  
**ANDRIOTIS LAW FIRM, P.A.**  
11 East Tarpon Avenue  
Tarpon Springs, Florida 34689  
Phone: 727-937-1400  
Fax: 727-937-1411

**GENERAL PERSONAL INJURY NEGLIGENCE —**  
**INTERROGATORIES TO DEFENDANT**

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

1. What is the name and address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

2. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, and your date of birth.

3. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction the specific crime and the date and place of conviction.

4. Describe any and all policies of insurance which you contend cover or may cover you for the allegations set forth in plaintiff's complaint, detailing as to such policies the name of the insurer, the number of the policy, the effective dates of the policy, the available limits of liability, and the name and address of the custodian of the policy.

5. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.

6. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.

7. State the facts upon which you rely for each affirmative defense in your answer. [Note: affirmative defenses are mere legal conclusions which are not "self explanatory". This interrogatory seeks what current facts, i.e., who, what, when, where, why and how, exist to support those defenses].

8. Do you contend any person or entity other than you is, or may be, liable in whole or part for the claims asserted against you in this lawsuit? If so, state the full name and address of each such person or entity, the legal basis for your contention, the facts or evidence upon which your contention is based, and whether or not you have notified each such person or entity of your contention.

9. Were you charged with any violation of law (including any regulations or ordinances) arising out of the incident described in the complaint? If so, what was the nature of the charge; what plea or answer, if any, did you enter to the charge; what court or agency heard the charge; was any written report prepared by anyone regarding the charge, and, if so, what is the name and address of the person or entity who prepared the report; do you have a copy of the report; and was the testimony at any trial, hearing, or other proceeding on the charge recorded in any manner, and, if so, what is the name and address of the person who recorded the testimony?

10. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

11. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and address of each person who made the statement or statements, the name and address of each person who heard it, and the date, time, place, and substance of each statement.

12. State the name and address of every person known to you, your agents, or your attorneys who has knowledge about, or possession, custody, or control of, any model, plat, map, drawing, motion picture, videotape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

13. Do you intend to call any expert witnesses at the trial of this case? If so, state as to each such witness the name and business address of the witness, the witness's qualifications as an expert, the subject matter upon which the witness is expected to testify, the substance of the facts and opinions to which the witness is expected to testify, and a summary of the grounds for each opinion.

14. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.

15. Please state if you have ever been a party, either plaintiff or defendant, in a lawsuit other than the present matter, and, if so, state whether you were plaintiff or defendant, the nature of the action, and the date and court in which such suit was filed.

16. Please state whether or not you were injured as a result of the subject incident, and if so, describe each injury, specifying the part of your body that was injured, the nature of the injury, and, as to any injuries you contend are permanent, and the effects on you that you claim are permanent.

17. As to each of the concurrently served request for admissions, if any of your responses is anything but an unqualified admission, state all facts upon which you base your qualified admission or denial.

18. If you contend the Plaintiff was not injured as a result of the October 08, 2010 accident, or not injured as badly he claims, and/or suffered from pre-existing or subsequent injuries, state all facts currently within your possession to support that contention. [Note: This interrogatory does not seek an explanation of Defendant's right to a general denial. This interrogatory seeks what current facts (i.e., who, what, when, where, how and/or why) exist that might support it.]

19. State whether or not you had a valid driver's license at the time of the accident, and if you did not, state when you first became aware you did not have a valid driver's license, and the circumstances that caused you to lose your driving privileges.

20. State with specificity why you did not remain at the scene of the accident until police arrived.

**SIGNATURE PAGE**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

BEFORE ME, the undersigned authority, personally appeared \_\_\_\_\_  
\_\_\_\_\_, who, upon being first duly sworn, deposes and says that \_\_\_\_\_ is the  
Defendant in the cause at issue and that \_\_\_\_\_ has read the above and  
foregoing Answers to Interrogatories and that the same are true and correct to the best of their  
knowledge and belief.

WITNESS my hand and official seal in the County and State aforesaid this \_\_\_\_\_ day of  
\_\_\_\_\_, 2013.

\_\_\_\_\_  
NOTARY PUBLIC, State of Florida at Large

My Commission Expires: