

Attorney for Defendant

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Plaintiff,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION:MORRIS COUNTY
	:	
v.	:	Civil Action
	:	
	:	DOCKET NO. L-004013-06
Defendant.	:	
	:	<b>INTERROGATORIES</b>
	:	

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To:

DEMAND IS HEREWITH MADE of the plaintiff, Fish Express Corp., for certified answers to the following interrogatories within the time prescribed by the rules of this court.

**INSTRUCTIONS AND DEFINITIONS**

A. As used herein, “describe” means (1) to describe in detail, (2) to set forth all relevant supporting facts, (3) to supply the names and addresses of all witnesses, relevant dates, and other relevant facts, and (4) to attach copies of relevant documents, reports, conversations (or, if voluminous, to state where and when they may be inspected) and, if oral, accurate memoranda of the conversation.

B. As used herein, “identify” means (1) when used with reference to a natural person, state the full name, present or last known address, present telephone number, present employer, current address of said employer, and if the employer may be a party to this litigation, past or present positions held by such natural person with the party/employer, (2) when used with reference to a corporation, partnership, associate, or other business enterprise, or legal entity, state the full name, current or last known address, and telephone number, (3) when used with reference to a document, written communication or other printed matter, please state: (a) the date; (b) the type of document (e.g., letter, memorandum, etc.); (c) author or addressee; and (d) present location and custodian, and if any such document was, but is no longer, under your control, state what disposition was made of it, by whom, and the date thereof. Also, attach copies of any documents referred to and attach copies of any documents which are attached to those requested. If documents are not attached to the answers to these interrogatories, the substance of the documents should be set forth and an explanation as to why the document is not being attached, and (4) when used with reference to an oral communication, identify (as set forth above) any and all persons involved in the communication and/or present

when the communication took place, the date, the time and place of said communication; further, set forth a thorough summary of the communication.

1. *Identify and state the full name and address of each and every person who furnished information necessary to complete the answers to these interrogatories.*

2. *Identify all persons (except the plaintiff's attorney herein) with whom the persons executing the answers to these interrogatories consulted in the preparation of these answers.*

3. *Identify all persons who have knowledge of any relevant fact relating to this case. For each such individual, set forth the name and address of his current employer, the name and address of his employer at the time he obtained knowledge of such relevant fact, and with respect to each employment, set forth the position and job title held by each individual.*

4. *Identify and state the full name and present address of each and every witness the plaintiff intends to call at trial and what the defendant proposes to prove by said witness' testimony.*

5. *Identify and set forth the name and current address of each person upon whom plaintiff intends to rely at trial as an expert witness.*

6. *Set forth the substance of the facts and opinions to which each expert is expected to testify and the summary of the grounds for each opinion.*

7. *Describe in detail the educational background, work history, professional experience, professional associations or other material upon which the plaintiff will rely to establish that each named individual is an expert in the field or area in which such individual is an expert.*

8. *Attach to the answers of these interrogatories true copies of all letters, memoranda, invoices, reports, checks or other writing of any description whatsoever upon which the plaintiff will rely at the time of trial to establish or prove any part of their case or which they intend to introduce into evidence for any purpose whatsoever at trial.*

9. *Describe in detail the factual basis for each allegation made, setting forth dates, times, places, names and addresses of persons present or involved in the conversations. Attach hereto copies of all writings.*

10. *Describe in detail all facts upon which the plaintiff intends to rely in the asserting of this action, and the name of each witness who will be employed at the time of the trial of this matter to establish each and every such fact.*

11. *State the names, address and telephone numbers of your employees who had any contact with the defendant or any representatives of the defendant in connection with the transaction which is the subject of the suit.*

12. *State whether the agreement allegedly entered into between the plaintiff and the defendant was oral or written.*

*a. when the agreement was entered into and the place of making the alleged agreement.*

*b. Name, address and job title of each person present when the agreement was entered into.*

13. *If the agreement was oral, state:*

*a. the substance of the agreement*

*b. what was said and done by each person present at the time of agreeing and identify the place where the parties entered into the agreement.*

*c. the name and address of each person present at the time of agreeing.*

14. *If you contend that the defendant failed to pay you for the goods you claim to have supplied to the defendant, please state:*

*a. the nature of the goods supplied;*

*b. the date ,time and place the goods were delivered;*

*c. the amount of the goods that were delivered;*

*d. the amount of the goods you claim you did not receive payment for;*

*e. identify all invoices ,bills of lading or other documents that describe in any manner the goods delivered and the amount of such invoices, bills of lading or other documents.*

*f. Attach copies of all such documents.*

15. *Where and to whom were the goods delivered? Supply a copy of any receipt signed upon delivery of the goods.*

16. *If you claim the defendant breached its agreement with you please state the manner in which you notified the defendant of the alleged breach and attach copies of all correspondence.*

17. *Please state where the alleged goods were delivered, who if anyone signed for the goods and attach copies of all documents, signed or unsigned. .*

18. *Does the answering party claim that any admission or declaration against interest was made by the propounding party or any other person or entity? If so, state:*

*(a) Give the date of such admission or declaration;*

*(b) Identify the parties who made or witnessed the admission or declaration;*

- (c) State the content of the admission or declaration;*  
*(d) Attach true, clear, and legible copies of all written admissions, declarations, or writings concerning any verbal admissions or declarations.*

### **CERTIFICATION**

I hereby certify that the copies of the reports annexed hereto rendered by proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such becomes later known or available, I shall serve them promptly on the propounding party.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

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*Signed by plaintiff*