

PLAINTIFF'S APPROVED AUTO  
ACCIDENT INTERROGATORIES  
TO DEFENDANT

IN THE CIRCUIT COURT OF GREENE COUNTY  
STATE OF MISSOURI

\_\_\_\_\_, )  
Plaintiff, ) Case No. \_\_\_\_\_  
v. )  
 )  
\_\_\_\_\_, )  
Defendant. )

**PLAINTIFF'S FIRST INTERROGATORIES DIRECTED TO DEFENDANT**

**Comes now plaintiff, and in accordance with the Missouri Rules of Civil Procedure,  
propounds the following interrogatories:**

1. Please state:
  - a. The name and address of the person or persons answering these interrogatories;
  - b. His/her relationship to defendant; and
  - c. His/her position of employment.

2. **BACKGROUND INFORMATION**

Please state:

- a. Defendant's full name;
- b. Name of defendant's spouse and date of marriage;
- c. Defendant's maiden name, if applicable;
- d. Defendant's age and date of birth;
- e. Defendant's present address;

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- f. Any other addresses at which defendant has lived during the past five years;
- g. Defendant's present employer's name and position of employment;
- h. Previous employers; names for the past five years and the dates of defendant's employment there; and
- i. Whether or not at the time of the collision referred to in plaintiff's petition, this defendant was performing any business task or job at the request of or on behalf of defendant's employer, and if so, please state the nature of the task or job being performed and the name of the employer.

3. STATEMENTS

Are you aware of any statements made by plaintiff as defined by the Missouri Rules of Civil Procedure, concerning this action or its subject matter, and if so, state the following:

- a. Date, place, and time taken;
- b. Name and addresses of all persons connected with taking it;
- c. Names and addresses of all persons present at the time it was taken;
- d. Whether the statement was oral, written, shorthand, recorded, taped, etc.;
- e. Was it signed; and
- f. Names and addresses of the persons or organizations under whose direction and upon whose behalf it was taken or made.

4. PHOTOGRAPHS, ETC.

State whether there exist photographs, videotapes, or movies with respect to the automobiles or scene of the occurrence mentioned in the petition. If so, state the following:

- a. Describe each photograph, video or movie;
- b. State the date each was taken;
- c. State the name and address of the person taking each such photograph, video, or movie; and

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- d. State the name, address, employer, and job title of the person presently having control or custody of each photograph, video or movie.

5. EXPERTS

- a. List and identify each person this defendant expects to call as a retained expert witness at trial, stating for each such expert:
- i. Name;
  - ii. Address;
  - iii. Occupation;
  - iv. Place of Employment;
  - v. Qualifications to give an opinion (if such information is available on an expert's curriculum vitae you may attach a copy thereof in lieu of answering this interrogatory subpart);
  - vi. The subject matter on which the expert is expected to testify; and
  - vii. The expert's hourly deposition fee.
- b. Identify each non-retained expert witness, including a party, who the defendant expects to call at trial who may provide expert witness opinion testimony by providing the expert's name, address and field of expertise.

6. WITNESSES

State the names and addresses of every person known by defendant, defendant's representatives or defendant's attorney to have witnessed the occurrence mentioned in the petition, or who was present at the scene within sixty (60) minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence.

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7. CRIMINAL RECORD

State whether defendant has ever pled guilty to or has ever been convicted of a felony or misdemeanor (State or Federal), and if your answer is in the affirmative, please state:

TO DEFENDANT

- a. The date of any such plea or conviction;
- b. The state and county where said plea or conviction occurred; and
- c. The offense to which you pled guilty or were convicted.

8. DESTINATION

State the defendant's starting location, intended destination and purpose of the trip at the time of the accident in question.

9. AUTO OWNERSHIP AND PROPERTY DAMAGE

- a. State the name and address of any and all registered or equitable owners of the vehicle being operated by defendant at the time of the occurrence in question; and
- b. State whether repair estimates were obtained or the vehicle was repaired, and if so, please state the amounts of any estimates and/or repair costs and the names and addresses of each person or company who prepared an estimate or repaired the vehicle.

10. VIOLATIONS

State whether defendant or his/her representatives was/were convicted of or pled guilty to any violation arising out of the collision in question, and if so, state the charges for which defendant or his/her representatives was/were convicted or pled guilty, the name and address of the court where same occurred, the date of final disposition, and the case number for plea or conviction.

11. INSURANCE

State whether or not any insurance company (including a company with excess or umbrella coverage) may be liable to satisfy part or all of a judgment against the defendant. If so, state the following:

- a. Name of the insurance company;
- b. Whether the insurance company is a stock company or a mutual company;
- c. Name of the insured;

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- d. Type of insurance;
- e. Effective policy dates;
- f. Policy number;
- g. Limits of the policy applicable to the occurrence mentioned in these pleadings; and
- h. Whether the policy provides for medical payments coverage, and if so, the amount of the coverage.

12. ALCOHOL, ETC.

State whether the defendant consumed alcoholic beverages, medication, or drugs within a 24 hour period prior to the collision in question, and if so, state the names and addresses of the places where said alcoholic beverages, medication, or drugs were consumed and describe the quantity and type of drinks, medication or drugs which were consumed in said period of time.

13. MECHANICAL DEFECTS

State whether a claim is made that there was a mechanically defective condition or mechanical failure of the vehicle being operated by defendant at the time of the collision in question which contributed to cause the collision in question, and if so, state the nature of said mechanically defective condition of the vehicle and what actually occurred to contribute to the cause of the accident in question.

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Attorney for Plaintiff