

## APPENDIX II. INTERROGATORY FORMS

### Form A. Uniform Interrogatories to be Answered by Plaintiff in All Personal Injury Cases: Superior Court

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. Full name, present address and date of birth.
2. Describe in detail your version of the accident or occurrence setting forth the date, location, time and weather.
3. Detailed description of nature, extent and duration of any and all injuries.
4. Detailed description of injury or condition claimed to be permanent together with all present complaints.
5. If confined to a hospital, state its name and address, and dates of admission and discharge.
6. If any diagnostic tests were performed, state the type of test performed, name and address of place where performed, date each test was performed and what each test disclosed. Attach a copy of the test results.
7. If treated by any health care provider, state the name and present address of each health care provider, the dates and places where treatments were received and the date of last treatment. Attach true copies of all written reports provided to you by any such health care provider whom you propose to have testify in your behalf.
8. If still being treated, the name and address of each doctor or health care provider rendering treatment, where and how often treatment is received and the nature of the treatment.
9. If a previous injury, disease, illness or condition is claimed to have been aggravated, accelerated or exacerbated, specify in detail the nature of each and the name and present address of each health care provider, if any, who ever provided treatment for the condition.
10. If employed at the time of the accident, state: (a) name and address of employer; (b) position held and nature of work performed; (c) average weekly wages for past year; (d) period of time lost from employment, giving dates; and (e) amount of wages lost, if any.
11. If there has been a return to employment or occupation, state: (a) name and address of present employer; (b) position held and nature of work performed; and (c) present weekly wages, earning, income or profit.
12. If other loss of income, profit or earnings is claimed: (a) state total amount of the loss; (b) give a complete detailed computation of the loss; and (c) state the nature and source of the loss of income, profit and earnings, and the dates of the deprivation.
13. Itemize in complete detail any and all moneys expended or expenses incurred for hospitals, doctors, nurses, diagnostic tests or health care providers, x-rays, medicines, care and appliances and state the name and address of each payee and the amount paid and owed each payee.
14. Itemize any and all other losses or expenses incurred not otherwise set forth.

15. Identify all documents that may relate to this action, and attach copies of each such document.

16. State the names and addresses of all eyewitnesses to the accident or occurrence, their relationship to you and their interest in this lawsuit.

17. State the names and addresses of all persons who have knowledge of any facts relating to the case.

18. If any photographs, videotapes, audio tapes or other forms of electronic recording, sketches, reproductions, charts or maps were made with respect to anything that is relevant to the subject matter of the complaint, describe: (a) the number of each; (b) what each shows or contains; (c) the date taken or made; (d) the names and addresses of the persons who made them; (e) in whose possession they are at present; and (f) if in your possession, attach a copy, or if not subject to convenient copying, state the location where inspection and copying may take place.

19. If you claim that the defendant made any admissions as to the subject matter of this lawsuit, state: (a) the date made; (b) the name of the person by whom made; (c) the name and address of the person to whom made; (d) where made; (e) the name and address of each person present at the time the admission was made; (f) the contents of the admission; and (g) if in writing, attach a copy.

20. If you or your representative and the defendant have had any oral communication concerning the subject matter of this lawsuit, state: (a) the date of the communication; (b) the name and address of each participant; (c) the name and address of each person present at the time of such communication; (d) where such communication took place; and (e) a summary of what was said by each party participating in the communication.

21. If you have obtained a statement from any person not a party to this action, state: (a) the name and present address of the person who gave the statement; (b) whether the statement was oral or in writing and if in writing, attach a copy; (c) the date the statement was obtained; (d) if such statement was oral, whether a recording was made, and if so, the nature of the recording and the name and present address of the person who has custody of it; (e) if the statement was written, whether it was signed by the person making it; (f) the name and address of the person who obtained the statement; and (g) if the statement was oral, a detailed summary of its contents.

22. If you claim that the violation of any statute, rule, regulation or ordinance is a factor in this litigation, state the exact title and section.

23. State the names and addresses of any and all proposed expert witnesses. Set forth in detail the qualifications of each expert named and attach a copy of each expert's current resume. Also attach true copies of all written reports provided to you by any such proposed expert witnesses.

With respect to all expert witnesses, including treating physicians, who are expected to testify at trial and with respect to any person who has conducted an examination pursuant to Rule 4:19, who may testify, state each such witness's name, address and area of expertise and attach a true copy of all written reports provided to you.

State the subject matter on which your experts are expected to testify.

State the substance of the facts and opinions to which your experts are expected to testify and a summary of the grounds for each opinion.

24. State whether you have ever been convicted of a crime. YES ( ) or NO ( ).

If the answer is “yes”, state: (a) date; (b) place; and (c) nature.

**TO BE ANSWERED ONLY IN AUTOMOBILE ACCIDENT CASES**

25. Do you have insurance coverage and/or PIP benefits under an applicable policy or policies of automobile insurance? As to each such policy provide the name and address of the insurance carrier, policy number, the named insured and attach a copy of the declaration sheet.

If you are making a claim for property damage to a motor vehicle, provide answers to the uniform interrogatories contained in Form B, questions 1 through 18.

**FOR MEDICAL MALPRACTICE CASES, ALSO ANSWER FORM A(1)  
FOR PRODUCT LIABILITY CASES (OTHER THAN PHARMACEUTICAL  
AND TOXIC TORT CASES), ALSO ANSWER A(2)**

**CERTIFICATION**

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

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

Note: Amended July 17, 1975 to be effective September 8, 1975; entire text deleted and new text added July 13, 1994 to be effective September 1, 1994; amended June 28, 1996 to be effective September 1, 1996; amended July 10, 1998 to be effective September 1, 1998; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; interrogatory 23 and certification amended July 28, 2004 to be effective September 1, 2004.

**Form A(1). Uniform Interrogatories to be Answered by Plaintiff in Medical Malpractice Cases Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. State your full name, address, date and place of birth and Social Security number.
2. State the date on which you first came under the medical care of the defendant(s).
3. State the reason(s) you first consulted the defendant(s).
4. State in detail the medical history you gave the defendant(s).
5. Describe the examination performed by the defendant(s) the first time you came under defendant's medical care.
6. Set forth each date on which you presented yourself to defendant(s) for examination and/or treatment and describe in detail the treatment given to you on each date.
7. State the name of each defendant that you contend was negligent, and state what you contend that each such defendant did that should not have been done and what you contend that each defendant did not do that should have been done, and the dates thereof. Set forth all facts on which you base your contentions. If you are relying on any written documents or records, identify those documents and records, and state the material in each document which you contend demonstrates negligence.
8. State the names and addresses of all persons having knowledge of relevant facts relating to this lawsuit and specify those who are eyewitnesses to any act of negligence.
9. State the names and addresses of any and all proposed expert witnesses. Set forth in detail the qualifications of each expert named and attach a copy of each expert's current resume. Also attach true copies of all written reports provided to you by any such proposed expert witnesses.

With respect to all expert witnesses, including treating physicians, who are expected to testify at trial, and with respect to any person who has conducted an examination pursuant to Rule 4:19, state each such witness's name, address and area of expertise and attach a true copy of all written reports provided to you.

State the subject matter on which your experts are expected to testify.

State the substance of the facts and opinions to which your experts are expected to testify and provide a summary of the factual grounds for each opinion.
10. If you or your expert intend to rely on or use in any way at trial any treatise, identify the treatise by title, author and edition and indicate the pertinent portions to be relied on or used at trial.
11. State whether or not you have been admitted to any hospital or other medical treatment facility in the last ten years and if so, state the name of the hospital or facility, the dates of admission and discharge, the illness, disease or condition that caused such admission and the names and addresses of the doctor(s) who treated you during such admission.

12. State whether you have undergone a physical examination in connection with employment or any application for employment in the last ten years. If so, state the date of any such examination, where it was conducted, who conducted the examination and whether there is a report of such physical examination. If a report was made, attach a true copy. If any such physical examination resulted in action being taken on your behalf or against you, please describe such action.

13. State whether you have ever suffered from any injury or disease other than the condition for which you consulted the defendant(s). If so, specify in detail the nature of each such injury or disease and the name and present address of each health care provider, if any, who ever provided treatment for the condition.

14. State whether you have ever had a family physician and if so, state physician's name, address and telephone number. Specify and describe any illness or injury for which the family physician has treated you during the past ten years.

15. State whether you have consulted any other health care provider in the past ten years. If so, specify in detail the nature of the condition for which you consulted the health care provider and the name and present address of each health care provider who ever provided treatment for the condition.

16. State whether any admissions or statements were made by any party to this action or their agents, servants or employees and if so, state:

- (a) whether oral, written or otherwise recorded;
- (b) the date, time and place made;
- (c) if oral, the words used, or a summary of same;
- (d) if written, attach a copy; and

(e) the names and addresses of all persons present at the time and place the statements or admissions were made.

17. State whether you have ever made a claim or filed a lawsuit against anyone arising out of any personal injury and if so, state for each such claim or lawsuit:

- (a) the date and place the injury occurred;
- (b) the court or place of filing;
- (c) the date of filing;
- (d) the names and addresses of all parties and their attorneys;
- (e) the nature and extent of all injuries;
- (f) the docket or claim number; and

(g) the present status of each such lawsuit or claim and if concluded describe the manner in which the lawsuit or claim was concluded and the payment, if any, you received.

18. Describe the injuries you sustained as a result of the negligence claimed in this lawsuit.

19. If you were treated, attended or examined by any physician(s) or others for the injuries identified in response to Question 18, state:

- (a) the names and addresses of all such persons;
- (b) whether you were admitted to a hospital or other medical treatment facility and if so provide the name and address of the facility and the dates of admission and discharge;
- (c) the dates of every treatment or examination and where they took place; and

(d) state the nature of the medical treatment given by each physician or other person.

20. State whether you are still afflicted with or suffering from the effects of any injury, illness or disability as a result of defendant's negligence. If so, describe in detail.

21. Set forth all claims for economic damages against the defendant(s), including lost wages, and itemize the amounts paid or owed, dates incurred, and the names and addresses of each person to whom paid or owed.

### **CERTIFICATION**

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

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

Note: New form interrogatory adopted June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; interrogatory 9 and certification amended July 28, 2004 to be effective September 1, 2004.

**Form A(2). Uniform Interrogatories to be Answered by Plaintiff in Product Liability Cases (Other Than Pharmaceutical and Toxic Tort Cases) Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. Describe in detail and with specificity the product involved in the incident that is the subject of this lawsuit, including the manufacturer's name, brand name, model number, serial number or other identifying decal or feature on the product.

If the product involved is a motor vehicle or any other product with component parts or systems, describe any part(s) or system(s) claimed to be defective or negligently designed, manufactured or distributed, or otherwise complained of.

2. Do you claim (a) that the product was defectively designed; (b) that the product was defectively manufactured; and/or (c) that the labelling or warnings on, attached to or accompanying the product were inadequate, misleading or insufficient? If so, set forth all facts (not legal conclusions) in support of your contention(s).

3. Do you claim that the defendant was negligent? If so, set forth all facts (not legal conclusions) in support of your contention. Do you claim that the defendant breached a warranty? If so, set forth all facts (not legal conclusions) in support of your contention. Set forth why any claims of negligence or breach of warranty are not subsumed in the product liability claim.

4. Identify all correspondence between plaintiff and the defendant or its representatives, and attach copies.

5. How did plaintiff come into possession of or contact with the product involved in the accident incident?

6. How long had the product involved in this incident been in the possession of or used by the plaintiff before the incident?

7. During the time given in response to the immediately preceding interrogatory, where was the product kept?

8. Where was the product immediately after the incident?

9. With respect to the product involved in the incident, set forth: (a) the name and address of the person presently having custody of the product; (b) the present location of the product; and (c) the last date that the product was in your possession.

10. State whether the product is currently in the same condition as immediately after the incident. If not, fully describe the changes that have occurred, who made them, the reason for such changes and the date they were made.

11. Did the product have any words or symbols on it or its packaging, or any written or pictured warnings attached to it? If so, set forth each writing and describe each symbol or picture.

12. Was an owner's manual or other literature provided with the product? If so, attach such manual or literature or, if a copy is not available, describe the manual or other literature and summarize its contents.

13. Have you ever pursued a workers' compensation claim for injuries sustained as a result of the incident that is the subject of this lawsuit? If so, set forth: (a) the title

and venue of every workers' compensation proceeding to which you have been a party; (b) the date upon which each such proceeding was instituted; (c) the date on which each such proceeding was tried and settled; (d) the name and address of each doctor who examined you in connection with each such proceeding; (e) the amount of the award you received from each such proceeding; and (f) the name and address of every employer or insurance company that has actually paid you workers' compensation benefits.

14. Do you contend that the design, labeling and warnings, manufacture or distribution of the product was governed by any governmental and/or industry codes, standards, regulations or advisories? If so: (a) state the name and address of the governmental agency or department, or the industry office; and (b) specifically identify the codes, standards, regulations or advisories by title and numerical, alphabetical or other coded designation.

15. Did you sustain any property damage or other economic loss as a result of the incident that is the subject of this lawsuit? If so, specify all such damages.

16. Do you contend that the product contained a design defect? If so, set forth your contention as to how the product should have been designed in a safer, more appropriate manner.

### **CERTIFICATION**

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

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

Note: New form interrogatory adopted July 10, 1998 to be effective September 1, 1998; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; certification amended July 28, 2004 to be effective September 1, 2004.

**Form B. Uniform Interrogatories to be Answered by Plaintiff: Property Damage to Motor Vehicle: Superior Court\***

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. Was the claimant the sole owner of the motor vehicle involved in the alleged accident?
2. State the name and address of the person, firm or corporation, from whom the claimant purchased the motor vehicle and the date of purchase.
3. Was the motor vehicle new or used at the time of purchase?
4. State make, model and year of motor vehicle.
5. State amount paid by claimant for the said motor vehicle.
6. State whether the motor vehicle has been repaired since the accident.
7. If so, give name and address of person, firm, or corporation making the repairs.
8. If so, state specifically the part or parts of the motor vehicle alleged to have been damaged in the accident and furnish a copy of the repair bill.
9. State date upon which claimant authorized the repair of the motor vehicle.
10. State date on which repairs were completed.
11. State the market value of this motor vehicle immediately before the accident.
12. State the market value of the motor vehicle in its damaged condition immediately after the accident.
13. State the market value of motor vehicle in its repaired condition.
14. Was the motor vehicle used in connection with claimant's business and, if so, state whether claimant was obliged to hire another motor vehicle for use in connection with that business, giving the name and address of person, firm or corporation from whom claimant hired the motor vehicle, the dates during which it was hired and the amount paid for its hiring.
15. If no repairs have been made, but an estimate of repairs has been obtained, attach a copy of the estimate to the answers to these Interrogatories, stating further the name and address of the person, firm or corporation who made the estimate.
16. Has the claimant sold or otherwise disposed of the motor vehicle?
17. If so, give the name and address of the person, firm or corporation to whom the motor vehicle was transferred, the date of the transfer, and the amount of consideration paid to the claimant therefor.
18. If it is alleged that the claimant incurred any other expenses or losses as a result of the alleged damage to the motor vehicle, set forth these additional alleged losses in detail, giving an itemized statement.
19. State the names and addresses of all persons who have knowledge of any relevant facts relating to the case.
20. State the names and addresses of any and all proposed expert witnesses and annex true copies of all written reports provided to you by any such proposed expert witnesses.

**CERTIFICATION**

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

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

Note: Amended July 7, 1971 to be effective September 13, 1971; amended July 13, 1994 to be effective September 1, 1994; amended June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; certification amended July 28, 2004 to be effective September 1, 2004.

## **Form C. Uniform Interrogatories to be Answered by Defendant in All Personal Injury Cases: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. State: (a) the full name and residence address of each defendant; (b) if a corporation, the exact corporate name; and (c) if a partnership, the exact partnership name and the full name and residence address of each partner.

2. Describe in detail your version of the accident or occurrence setting forth the date, location, time and weather.

3. If you intend to set up or plead or have set up or pleaded negligence or any other separate defense as to the plaintiff or if you have or intend to set up a counterclaim, cross-claim, or third-party action, (a) state the facts upon which you intend to predicate such defenses, counterclaim, cross-claim, or third-party action; and (b) identify a copy of every document relating to such facts.

4. State the names and addresses of all persons who have knowledge of any relevant facts relating to the case.

5. State (a) the name and address of any person who has made a statement regarding this lawsuit; (b) whether the statement was oral or in writing; (c) the date the statement was made; (d) the name and address of the person to whom the statement was made; (e) the name and address of each person present when the statement was made; and (f) the name and address of each person who has knowledge of the statement.

Unless subject to a claim of privilege, which must be specified: (g) attach a copy of the statement, if it is in writing; (h) if the statement was oral, state whether a recording was made and, if so, set forth the nature of the recording and the name and address of the person who has custody of it; and (i) if the statement was oral and no recording was made, provide a detailed summary of its contents

6. If you claim that the plaintiff made any statements or admissions as to the subject matter of this lawsuit, state: (a) the date made; (b) the name of the person by whom made; (c) the name and address of the person to whom made; (d) where made; (e) the name and address of each person present at the time the admission was made; (f) the contents of the admission; and (g) if in writing, attach a copy.

7. If you contend that the plaintiff's damages were caused or contributed to by the negligence of any other person, set forth the name and address of the other person and the facts upon which you will rely in establishing that negligence.

8. State the names and addresses of all eyewitnesses to the accident or occurrence, their relationship to you and their interest in this lawsuit.

9. If any photographs, videotapes, audio tapes or other forms of electronic recording, sketches, reproductions, charts or maps were made with respect to anything that is relevant to the subject matter of the complaint, describe: (a) the number of each; (b) what each shows or contains; (c) the date taken or made; (d) the names and addresses of the persons who made them; (e) in whose possession they are at

present; and (f) if in your possession, attach a copy, or if not subject to convenient copying, state the location where inspection and copying may take place.

10. State the names and addresses of any and all proposed expert witnesses. Set forth in detail the qualifications of each expert named and attach a copy of each expert's current resume. Also attach true copies of all written reports provided to you by any such proposed expert witnesses.

With respect to all expert witnesses, including treating physicians, who are expected to testify at trial, and with respect to any person who has conducted an examination pursuant to Rule 4:19, state each such witness's name, address and area of expertise and attach a true copy of all written reports provided to you.

State the subject matter on which your experts are expected to testify.

State the substance of the facts and opinions to which your experts are expected to testify and provide a summary of the factual grounds for each opinion.

11. If you contend or intend to contend at the time of trial that the plaintiff sustained personal injuries in any prior or subsequent accident, state: (a) the date of said accident; (b) the injuries you contend that plaintiff sustained; (c) the parties involved in said accident; (d) the source from which you obtained the information; and (e) attach a copy of any written documents regarding this information.

12. If you intend to rely on any statute, rule, regulation or ordinance, state the exact title and section.

13. Pursuant to R. 4:10-2(b), state whether there are any insurance agreements including excess policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment that may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. YES (\_\_\_\_) or NO (\_\_\_\_).

If the answer is "yes", attach a copy of each insurance agreement or policy, or in the alternative state: (a) number; (b) name and address of insurer or issuer; (c) inception and expiration dates; (d) names and addresses of all persons insured thereunder; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; and (i) where and when each policy or agreement can be inspected and copied.

14. Identify all documents that may relate to this action, and attach copies of each such document.

15. State whether you have ever been convicted of a crime. YES (\_\_\_\_) or NO (\_\_\_\_).

If the answer is "yes", state: (a) date; (b) place; and (c) nature.

**For Automobile Cases, Also Answer Form C(1)**  
**For Falldown Cases, Also Answer Form C(2)**  
**For Medical Malpractice Cases, Also Answer Form C(3)**  
**For Product Liability Cases (Other Than Pharmaceutical and**  
**Toxic Tort Cases), Also Answer Form C(4)**

## **Certification**

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

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

Note: Amended July 17, 1975 to be effective September 8, 1975; entire text deleted and new text added July 13, 1994 to be effective September 1, 1994; entire text deleted and new text added June 28, 1996 to be effective September 1, 1996; amended July 10, 1998 to be effective September 1, 1998; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; interrogatory 10 and certification amended July 28, 2004 to be effective September 1, 2004; interrogatory 3 amended July 27, 2006 to be effective September 1, 2006.

**Form C(1). Uniform Interrogatories to be Answered by Defendant in Automobile Accident Cases Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. With respect to the vehicle involved in the incident referred to in the complaint:

	Underline Answer	
(a)Do you admit ownership?	Yes	No
(b)Do you admit operation?	Yes	No
(c)Do you admit agency?	Yes	No
(d)Do you admit control?	Yes	No
(e)Do you admit the date and place?	Yes	No

2. If you do not admit ownership, state: (a) the name and address of the owner; (b) whether you were operating the motor vehicle with permission of the owner; and (c) the registration number, year, make, model and color of each motor vehicle owned by you on the date of the collision as alleged in the complaint.

3. If you do not admit operation, state the name and address of the operator.

4. If you do not admit agency and the owner was not also the operator, state: (a) the circumstances under which the vehicle came into the possession of the operator; (b) the purpose for which the vehicle was being used; and (c) its destination.

5. If you do not admit control: (a) state the name and address of the one in control; and (b) if control was in another by agreement, state the names and addresses of the parties to the agreement, whether the agreement was oral or written and briefly, the terms of the agreement.

6. If you do not admit the date and place of the collision as alleged in the complaint, state the date and place of the collision as you recall it.

7. State whether your vehicle was licensed under an Interstate Commerce Commission permit. YES ( ) or NO ( ).

If the answer is “yes”, state: (a) the number of such permit; (b) the name and address of the permittee; and (c) the name and address of the lessee or other person in control, if any.

(Note: The term “your vehicle” in this and other questions herein has reference to the vehicle in which you were an occupant at the time of the collision.)

8. State on what street, highway, road or other place (designate which) and in what general direction (north, south, east or west) your vehicle was proceeding immediately prior to the collision. (You may include a sketch for greater clarity.)

9. With respect to fixed objects at the location of the collision, state as nearly as possible the point of impact. If you included a sketch, place an X thereon to denote the point of impact.

(Note: The term “point of impact” as used in this and other questions has reference to the exact point on the street, highway, road or other place where the vehicles collided.)

10. State whether there were any traffic control devices, signs or police officers at or near the place of the collision. If there were, describe them (i.e., traffic lights, stop sign, police officers, etc.) and state the exact location of each.

11. If you contend that there was a malfunction of a motor vehicle or equipment, state: (a) make, model and year of the motor vehicle and whether or not that vehicle was equipped with power brakes and steering; (b) the nature of the malfunction; (c) the date the motor vehicle was purchased and the name and address of the person from whom the motor vehicle was purchased; (d) the date that that portion of the motor vehicle in which the malfunction occurred was last inspected and the name and address of the person inspecting same; (e) the last date prior to the accident that that portion of the motor vehicle was repaired or replaced, the nature and extent of the repairs, the name and address of the person repairing or replacing same; (f) if the motor vehicle was repaired after the accident, state the name and address of the person repairing same and the nature of the repairs; and (g) attach a copy of any repair bills.

12. If the collision occurred at an uncontrolled intersection, state: (a) which vehicle entered the intersection first; (b) whether your vehicle came to a full stop before entering the intersection; and (c) if your vehicle did not come to a full stop before entering the intersection, state the speed of your vehicle when it entered the intersection.

13. State in terms of feet the distance between: (a) the front of your vehicle and the point of impact at the time you first observed the other vehicle or vehicles collided with, and state your speed at that time; (b) the front of the other vehicle or vehicles collided with and the point of contact at the time you first observed it or them and state its or their speed at that time; and (c) your vehicle and the vehicle or vehicles collided with at the time you first saw it or them.

14. State where each vehicle came to rest after the impact. Include the distance in terms of feet from the point of impact to the point where each vehicle came to rest.

15. State what part of your vehicle came into contact with what part of the other vehicle or vehicles involved.

16. State the following facts with respect to the collision: (a) time; (b) condition of weather; (c) condition of visibility; and (d) condition of roadway.

17. State the names and addresses of all persons occupying your vehicle.

18. Did you observe the plaintiff's vehicle prior to the accident? YES ( ) or NO ( ).

If the answer is "yes", set forth the time that elapsed from the time you first saw the plaintiff's vehicle until the impact occurred.

19. At the time of the impact, state the speeds of all vehicles involved in the collision.

20. Were you charged with a motor vehicle violation as a result of the collision? YES ( ) or NO ( ).

If the answer is "yes", state: (a) charge; (b) plea; and (c) disposition.

### **CERTIFICATION**

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

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

Note: New form interrogatory adopted June 28, 1996 to be effective September 1, 1996;  
new introductory paragraph added July 5, 2000 to be effective September 5, 2000;  
certification amended July 28, 2004 to be effective September 1, 2004.

**Form C(2). Uniform Interrogatories to be Answered by Defendant in Falldown Cases Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. If the accident or occurrence took place on or about any particular premises, area or location, or involved the use or presence of any object, thing, vehicle, equipment or property, state the name and address of the owner thereof.

2. If anyone other than the owner had any interest, custody, or possession or was in charge of such premises, area, location, object, thing, vehicle, equipment or property, state: (a) the name and address of such person, firm or corporation; and (b) the nature and extent of such interest, custody, possession or charge.

3. If you were not present at the time of the accident or occurrence, state: (a) whether you had notice or knowledge thereof; (b) when, where, in what manner and from whom such notice or knowledge was received or acquired; and (c) whether there was any person(s) acting on your behalf present on the premises at the time of plaintiff's injury and, if so, include their name(s) and address(es).

4. If prior to the accident or occurrence, you had actual notice or knowledge of the conditions, artificial or natural, alleged by the plaintiff to have caused or resulted in the accident or occurrence, state: (a) on what date you had such actual notice or first acquired such knowledge; and (b) the manner in which such notice or knowledge was received or acquired.

5. If the complaint or any answers to interrogatories by plaintiff allege that artificial conditions caused or resulted in the accident or occurrence or was causally related thereto, state when and by whom such artificial conditions were created.

6. If you had notice of or were in any manner made aware of any such artificial conditions, state when and what steps you took to eliminate them or make them safe or give any notice of their existence.

7. Do you, or does any person acting on your behalf, have any reports concerning the occurrence of plaintiff's injury? YES ( ) or NO ( ).

If the answer is "yes", state: (a) the full name, present or last known address and telephone number of the person making it; (b) the date made; (c) the purpose of each report, including, but not limited to, investigatory or accident report; (d) the field of expertise and relationship to you of the person making it; (e) whether or not it was made in the regular course of business; (f) the findings; (g) whether it was written or oral; and (h) if written, attach a copy hereto, and if oral, set forth the substance thereof.

8. State whether any repairs were made to the premises or property after plaintiff's injury. YES ( ) or NO ( ).

If the answer is "yes", state: (a) the full name and present or last known address of each person who endeavored to correct the condition; (b) indicate the nature of the work performed; and (c) describe in detail the exact nature and location of the condition as it was found to exist prior to any work performed.

9. Do you claim that plaintiff was not lawfully on said premises at the time of the occurrence of the injury? YES ( ) or NO ( ).

If the answer is “yes”, state: (a) what you claim to be the legal status of plaintiff at said time; and (b) the factual basis of your claim.

### **CERTIFICATION**

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

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

Note: New form interrogatory adopted June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; certification amended July 28, 2004 to be effective September 1, 2004.

**Form C(3). Uniform Interrogatories to be Answered by Defendant Physicians in Medical Malpractice Cases Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

1. Identify and describe the appearance of each and every person who was present in the vicinity of the alleged occurrence, giving the name, address and occupation of each such person and stating your relationship to each.

2. Describe in detail all aspects of your professional medical relationship with the plaintiff, indicating the date of commencement, the nature and extent of your medical relationship prior to the alleged occurrence, and the date and circumstances of the termination of your professional medical relationship.

3. In reference to the condition that forms the basis of the complaint, set forth:

(a) the date(s) and circumstances under which you saw plaintiff;

(b) any and all medical history given to you;

(c) the examination(s) conducted of the plaintiff;

(d) your findings on each examination;

(e) your prognosis and diagnosis following each examination; and

(f) any treatment or medication prescribed.

4. Attach your Curriculum Vitae or describe in detail your education, training, experience, published materials, service on boards and committees, continuing education and certifications, prior work and hospital affiliations, licenses and specialties.

5. Have your full rights or privileges to practice medicine been suspended, revoked or terminated in any state or hospital since you started to practice medicine? If the answer to this question is in the affirmative, state:

(a) the reason why your full rights or privileges to practice medicine or any hospital association were suspended, revoked or terminated; and

(b) the name of the state or hospital that suspended, revoked or terminated your full rights or privileges to practice medicine.

6. If you have ever been a defendant in a malpractice suit other than the present one, identify the case by name, court and docket number, and summarize the allegations against you and the outcome of the case, including the terms of any settlement.

7. Attach a complete copy of any written records or documents that you have regarding plaintiff, along with a typed transcription of any handwritten records and documents.

8. Attach a copy of all documents that the plaintiff signed consenting to any treatment or procedures performed or prescribed by you, as well as a copy of any literature, material, pamphlets, instructions or other information or documents that you supplied to plaintiff.

9. List all risks that you described to the plaintiff with respect to any treatment or procedures you prescribed or performed.

10. If you contend that the plaintiff's injuries were caused in whole or in part by an inherent defect in a drug, instrument, implement or other type of product or substance, identify each such allegedly defective item, including in your identification:

- (a) a complete description of its appearance, and appearance of its container or wrapper, if any;
  - (b) the name and address of its manufacturer;
  - (c) the name and address of the dealer or seller who sold it to the person who owned it at the time of the alleged occurrence;
  - (d) the name, occupation, title, address and professional relationship to you of the person who owned it at the time of the occurrence;
  - (e) a description of the use to which it is normally put;
  - (f) its serial number, batch number or other specific identifying characteristics;
- and
- (g) the medical name for this product and a lay description of it and its use.

11. If there were any reviews performed, including investigations undertaken, hearings held or reports prepared, by the hospital, its medical staff or any officer, committee or agency of the hospital or any public body or other person or persons concerning the condition that forms the basis of the complaint, state:

- (a) the name and position of the person, persons or committee that performed the review;
- (b) the date and time of each review;
- (c) the name, address, profession or professional relationship to you of all persons present at each review;
- (d) the nature and purpose of each review;
- (e) whether the review was recorded; and
- (f) the name and address of each person who has any records concerning each review.

12. Did you refer to or rely upon any medical texts or publications in connection with the diagnosis or treatment of plaintiff? If so, identify those items by title, author and publisher.

13. If you or your expert intend to rely on or use in any way at trial any treatise, identify the treatise by title, author and edition and indicate the pertinent portions to be relied on or used at trial.

14. If you claim that the alleged occurrence resulted from the plaintiff's own lack of care, set forth as fully and specifically as you can what acts, conduct or omissions constituted such lack of due care.

15. State the names and addresses of all consultants or other physicians who saw, examined and treated plaintiff at your request for the condition forming the basis of the complaint, and in relation to all such consultations or examinations by other physicians indicate:

- (a) the reason you requested consultations or further examination;
- (b) when the consultation or examination took place; and
- (c) all opinions or reports rendered to you by the consultant or examining physician.

16. The plaintiff in the complaint alleges that while under your care he/she sustained the injury and disability which is the subject matter of this lawsuit. In relation to such injury and disability, indicate in your opinion the cause of that injury and disability.

## **CERTIFICATION**

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

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

Note: New form interrogatory adopted June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; interrogatory 15(c) and certification amended July 28, 2004 to be effective September 1, 2004; interrogatory 15(c) amended July 27, 2006 to be effective September 1, 2006.

**Form C(4). Uniform Interrogatories to be Answered by Defendant in Product Liability Cases (Other than Pharmaceutical and Toxic Tort Cases) Only: Superior Court**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

(Caption)

In propounding the interrogatories, plaintiff should provide this information:

- (a) A description of the product, as specific as possible.
- (b) The date and place of purchase, if known.
- (c) The make, model and any serial number or other identifying decal or feature on the product.
- (d) Any words printed on the product.
- (e) If the product involved is a motor vehicle or has component parts, a description of any part(s) or system(s) claimed to be defective or negligently designed, manufactured or distributed, or otherwise complained of.
- (f) A general description of the manner in which plaintiff claims to have been injured.

Answers to these interrogatories should be furnished within the context of the information provided by plaintiff in (a) through (f), above.

1. Did you manufacture the product? If so, state: (a) the date and place of manufacture; (b) the date you sold or otherwise distributed the product; and (c) the name and address of the person or entity that purchased the product from you. If you did not manufacture the product, state the name and address of the person or firm who did so. State the name and address of the person or entity from which you purchased the product.

2. Did you sell or otherwise distribute the product? If so, state: (a) the date on which you sold or otherwise distributed the product; (b) the names and addresses of all persons and entities that sold or otherwise distributed the product; and (c) the dates of sale and distribution for each such person or entity.

3. State the name and address of any person, firm or entity that did the following with respect to the product (if the product is a motor vehicle or has component parts, this question pertains to the subpart(s) or system(s) complained of): (a) designed it; (b) manufactured it; (c) assembled it; (d) packaged it; (e) distributed it, through sale or otherwise; (f) advertised it; (g) installed it; and (h) serviced or otherwise maintained it.

4. Were there any writings or warnings on the product itself, on its packaging, or on anything attached or appended to the product, when it left your control? If so, state specifically and fully the exact words used and their location. If a warning was given in other than words, attach copies of any and all symbols or depictions used.

5. State whether you provided to a distributor, possible user or any person or firm that you expected to come in contact with the product, any form of written material, such as an owner's manual, repair manual, parts manual or any other writing pertaining to the product. If so, attach a copy of any such written material. If you do not have a copy, state specifically what was written or depicted.

6. Have you or any other person or entity repaired, altered, or otherwise changed the design or specifications of the product (in the case of a motor vehicle or a product

with component parts, this question refers to the subpart(s) or system(s) complained of) from the date of manufacturing to the date of the incident? If so, state: (a) the name and address of the person or entity who made the repair, alteration or change; (b) the date of each such change; (c) the specific details of the change; (d) the name and address of the officer, managing agent or other person(s) in your organization most involved with such change; and (e) the names and addresses of all your employees or agents who were involved in such change. If the change is displayed on plans, specifications, blueprints or other drawings, or described in any document, attach a legible copy of such plans, specifications, blueprints, drawings or documents.

7. If, from the date the product was manufactured until the date of the incident, any writings or warnings pertaining to the product were added, altered, or otherwise changed, state: (a) the date of each such change; (b) the specific words or symbols used in each such change; (c) the name and address of the officer, managing agent or other person(s) in your organization most involved with such change; and (d) the names and addresses of all of your employees who were involved in such change.

8. Identify all correspondence between plaintiff and the defendant or its representatives, and attach copies.

9. State whether you intend to assert any defenses at the time of trial.

(a) If so, and the defenses are based upon the common-law, state the principle involved and fully provide the factual basis for any such defense.

(b) If so, and the defenses are based upon a statute, regulation or other written rule, identify each such statute, regulation or rule and fully provide the factual basis for any such defense.

(c) If so, and your defense is based upon an alteration, use, misuse of or other change in the product, indicate each such defense and fully provide the factual basis for any such defense.

10. State whether at any time prior to answering these interrogatories and subsequent to the date of manufacturing or distribution of the product itself or similar products by this defendant any person complained or alleged that he, she or anyone suffered bodily injuries or death as a result of using the product in the manner in which plaintiff claims to have used the product when the injury occurred. If so: (a) identify all such claimants and their attorneys; (b) describe as specifically as possible the product involved, including but not limited to the model and serial numbers; and (c) if a lawsuit was instituted against the defendant, state the names and addresses of the claimants, their attorney(s) and the court in which such claim was instituted.

11. If you allege that any other person or entity or product manufactured by any other person or entity is responsible for the incident, provide the name and address of that person or entity, identify the product, if any, and fully provide the factual basis for the allegation.

12. Are you a member of or affiliated with any trade organization or industry group that promulgates written standards, habits or customs pertaining to the product involved in the accident? If so, provide the address of each such organization or group, and attach a copy of the written standards promulgated.

13. Do you contend that the design, manufacture or distribution of the product was governed by any governmental and/or industry codes, standards, regulations or advisories? If so: (a) state the name and address of the governmental agency or

department, or the industry office; and (b) specifically identify the codes, standards, regulations or advisories by title and numerical, alphabetical or other coded designation.

### **CERTIFICATION**

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

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

Note: New form interrogatory adopted July 10, 1998 to be effective September 1, 1998;  
new introductory paragraph added July 5, 2000 to be effective September 5, 2000;  
certification amended July 28, 2004 to be effective September 1, 2004.

**Form D. Uniform Interrogatories by Defendant in Motor Vehicle Collision Case Involving Property Damage: Special Civil Part**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

PLEASE ANSWER THE FOLLOWING QUESTIONS WITH RESPECT TO THE COLLISION DESCRIBED IN THE PLAINTIFF'S COMPLAINT.

1. State the registration number, make, model and year of the plaintiff's vehicle.
2. Specifically describe the condition of the vehicle immediately before the collision.
3. Specifically describe how the vehicle was damaged in the collision.
4. Please state: A) Did you obtain an estimate of repairs for the damage to the vehicle? If so, B) list the estimated cost of each repair and attach a copy of the estimate of repairs including the name and address of the person or company providing the estimate.
5. Please state: A) Has the vehicle been repaired since the collision? If so, B) list each repair; C) the price paid for each repair; D) the date of each repair; E) the name and address of each person or company performing the repairs. Attach copies of all repair bills.
6. If the motor vehicle was declared a total loss, attach all documents relating to the Actual Cash Value of the vehicle, salvage value and any related expenses.
7. Please state: A) Did the plaintiff rent a replacement vehicle? If so, B) list the name of the company; C) the price paid; D) the length of time the rental was required; and E) the reasons the rental was required.
8. Please state: A) Did the plaintiff have any other expenses as a result of the collision? If so, B) give an itemized statement of each such expense; C) the cost of each such expense; and D) an explanation of the reason for the expense.
9. List the names and addresses of anyone who may have direct knowledge of any of the facts relating to the collision or this case. Include in your answer eyewitnesses and experts or other witnesses who may testify. Attach copies of expert reports, if any.
10. Give details of the accident: A) date; B) time; C) weather; D) visibility and E) road condition.
11. Who was driving your vehicle at the time of the accident? Name and address.
12. List the names and addresses of the occupants of the vehicle and their location in the vehicle.
13. Where did the accident happen? Street and town.
14. Which street was your vehicle on at the time of the accident?
15. Which direction was your vehicle going at the time of the accident?
16. Where on the roadway did the collision take place? You may include a sketch for greater clarity.
17. Please state: A) How did this accident happen? B) Who was at fault and how? C) Any other factors you believe contributed to the accident.
18. Did the other driver break any laws? If so, which laws?

19. Please state: A) Were there traffic lights, signs, or other controls for any of the vehicles involved in the accident? If so, B) What kind of light, sign or control? C) Where were they? D) Who were they for?

20. Please state: A) Did the accident happen in an intersection? B) Who was in the intersection first? C) Did your car stop before it entered the intersection? D) How fast was your vehicle going when it entered the intersection?

21. Please state: A) How far was your vehicle from the other vehicle when it was first seen? B) How fast was your vehicle going when the other vehicle was first seen? C) How fast was the other vehicle going when it was first seen?

22. After the accident where did the vehicle stop?

23. State what part of your vehicle came into contact with what part of the other vehicle or vehicles involved.

### **CERTIFICATION**

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

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 experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

DATED:

SIGNED:

Note: Amended July 7, 1971 to be effective September 13, 1971; entire text deleted and new text added June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; certification amended July 28, 2004 to be effective September 1, 2004.

**Form E. Uniform Interrogatories by Plaintiff in Motor Vehicle Collision Case:  
Special Civil Part**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

PLEASE ANSWER THE FOLLOWING QUESTIONS WITH RESPECT TO THE COLLISION DESCRIBED IN THE PLAINTIFF'S COMPLAINT.

1. Did you own one of the vehicles involved in the accident?
2. Were you driving one of the vehicles involved in the accident?
3. If it was your vehicle, but you were not driving, who was?
4. If it was your vehicle, but you were not driving, what was the driver doing with your vehicle?
5. If you were not the owner of the vehicle you were driving, give the name, address and telephone number of the owner.
6. If you were not the owner of the vehicle you were driving, list the vehicles you owned on the date of the accident.
7. If you were not driving your vehicle, give the name, address and telephone number of the person who was driving.
8. If you were not the driver, how did the driver get your vehicle and what was the driver doing with it?
9. List the names and addresses of the occupants of the vehicle and their location in the vehicle.
10. List the registration number, year, make and model of the vehicles involved in the collision.
11. Give details of the accident: A) date; B) time; C) weather; D) visibility and E) road condition.
12. Where did the accident happen? Street and town.
13. Which street was your vehicle on at the time of the accident?
14. Which way was your vehicle going at the time of the accident?
15. Where on the roadway did the collision take place? You may include a sketch for greater clarity.
16. Please state: A) How did this accident happen? B) Who was at fault and how? C) Any other factors you believe contributed to the accident.
17. Did the other driver break any laws? If so, which laws?
18. Please state: A) Were there traffic lights, signs, or other controls for any of the vehicles involved in the accident? B) What kind of lights, signs or controls? C) Where were they? D) Who were they for?
19. Please state: A) Did the accident happen in an intersection? B) Who was in the intersection first? C) Did your vehicle stop before it entered the intersection? D) How fast was your vehicle going when it entered the intersection?
20. Please state: A) How far was your vehicle from the other vehicle when it was first seen? B) How fast was your vehicle going when the other vehicle was first seen? C) How fast was the other vehicle going when it was first seen?
21. After the accident where did the vehicles stop?

22. State what part of your vehicle came into contact with what part of the other vehicle or vehicles involved.

23. List the names and addresses of anyone who may have direct knowledge of any facts relating to the collision or case. Include in your answer eyewitnesses and experts or other witnesses who may testify at trial. Attach copies of expert reports, if any.

24. State whether you had insurance at the time of the accident. If yes, state name and address of all insurance companies and policy numbers.

### **CERTIFICATION**

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

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 experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

DATED:

SIGNED:

Note: Amended July 7, 1971 to be effective September 13, 1971. Paragraph (18) adopted June 29, 1973 to be effective September 10, 1973; entire text deleted and new text added June 28, 1996 to be effective September 1, 1996; new introductory paragraph added July 5, 2000 to be effective September 5, 2000; certification amended July 28, 2004 to be effective September 1, 2004.