

report

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Interrogatories

Student Name:

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Date:

INTERROGATORIES

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IN THE MINNEAPOLIS CIRCUIT COURT, MINNESOTA

Civil Division

DELILA DEARBORN,

The Plaintiff,

Vs.

QUICK BITE

The Defendant.

Case No.

INTERROGATORIES OF THE PLAINTIFF TO DEFENDANT

TO: QUICK BITE, The Defendant

FROM: DELILA DEARBORN, The Plaintiff

The Plaintiff, Delila Mitchell, by, as well as, via her attorneys, Jan Hendriksson, Lokam, and Meijer, PLLC, makes the request that Defendant, Quick Bite (hereinafter referred to as "Defendnat"), respond to the interrogatories listed hereinafter fuller, not only under oath but also in respect to Minnesota Civil Procedure Rules, Rule 4-654, in respect to the guidelines stipulated below:

Definitions and Instructions

- a. The interrogatories featured herein under are continuing in terms of character for purposes of requiring you to file additional responses in the event you acquire extra information prior to the filing of this lawsuit but prior to ²trial.

- b. Unless stated otherwise, these Interrogatories are in reference to the place, time, as well as, circumstance of the incident complained of or mentioned within the lawsuit.
- c. Wherever person's name together with identity of an individual is needed, kindly specify the names in full, business or home address, in case they are known.
- d. "Identify" while making reference to a person, organization or any other party shall imply setting forth the party's name along with the phone number and, in case the entity, its main business area or, in case a person, the current or last recorded home address, job title, by employer and the employer's address.
- e. The pronoun "you" is used in reference to Quick Bite and related entities.
- f. "Defendant" is the term used in reference to the accused person.
- g. "Statement" refers to the information recorded or obtained from any of the persons that have been questioned about the incident.
- h. "Correspondence" is the term used in reference to the communication made either through letters or e-mail.
- i. Where information or knowledge possessed by a party is requested, requests of that nature encompass knowledge of representatives or agents of the party, and unless otherwise, his attorneys.

Interrogatories

1. Kindly name the individual or individuals reacting to the interrogatories on Quick Bite. Kindly identify within your answer every individual who has offering details in relation to the featured interrogatory answers.

2. Specify the proprietor of the grounds that go by the said name Quick Bite, situated on 5th St., Minneapolis (hereinafter referred to as “Premises”) going by the date of April 24, 2019.
3. Name the person that should be held accountable for the maintenance of the walkways, along with common areas of Quick Bite.
4. Identity any party or individual besides the Defendant within the case that you considered contributed or caused to the reported incident complained of, inclusive of a designer, architect, engineer, contractor or others.
5. Identify every employee, servant or agent or any other individual who is aware of the occurrence. For each such person, mention his or her job position, along with the duty being carried out by that person during the instance of the slip along with fall incident, as well as a synopsis of the information the witness possessed.
6. Indentify all persons that you know about who has information about this lawsuit, inclusive although not restricted to bystanders, individuals alleging to have witnessed the incident along with any person got to the scene of the incident on April 24, 2019 within three (3) hours upon the occurrence.
7. In the event there is any party investigated this matter on your behalf, inclusive, but not restricted to, private investigators or insurance representatives or medical professionals, specify their full name(s) together with their respective address(es), as well as, indicate whether such investigation was written down, and the type of their investigation, as well as, conclusions. If the investigating team in question acquired any consented, recorded or verbal statement from other parties, specify the parties that offered the given statement along with the guardian of the said statement.

8. Specify all individuals questioned regarding the occurrence. All such individuals should specify the interview date, the nature of the questioning, as well as, whether the interviewed was transcribed and/or recorded.
9. Identify all the written reports compiled by every individual regarding the incident.
10. Kindly outline in your personal perspective whatever you consider occurred to the Plaintiff while within the Premises, as well as, specify within the response the manner in which you reached to that conclusion.
11. Specify if the said Premises had been fitted with surveillance cameras and, if they are there, who had been assigned the duty to observe the security camera during the incident date and if tapes are still there from that incident date and days both before, as well as, after the incident.
12. Define both artificial and natural source of lighting of the premises during the period when the complainant got injured.
13. Whether you have information about the presence of pictures, visual images, plats, diagrams, police information or objects about the incident, the Plaintiff's physical condition, specify the content of such recording, as well as, keeper of every such item.
14. Are you aware about all conversations, statements or testimonies given by all persons about the case, inclusive of the Plaintiff, made during the time the incident occurred or after the incident, regarding the facts applicable to any subject within the case? In the event the answer happens to be in the affirmative, specify the details of such report, testimony, discussion or comment, the area where it occurred and the keeper of the same.

15. Do you hold the opinion that you did all that was possible on your side to prevent the injuries of the plaintiff? Outline all the actions that you had undertaken to prevent the occurrence of the accident. Do you wish you would have done anything differently?
16. Specify any processes that you followed, during and prior to the occurrence, regarding the assessment, cleaning, maintenance along with repair of the place whereby the injuries of the Plaintiff took place.
17. Outline any warnings wither written or verbal that were specifically to the Plaintiff and other visitors to the Premises, prior to the incident regarding the circumstances that brought about or resulted to the occurrence.
18. Do you hold the opinion that the Plaintiff was aware or should have been informed that the area within which she fell was unsafe to walk on, either by her or anyone else? Outline the facts on which you plan to rely upon during trial for the purposes of supporting your answer.
19. Dou you think that any reasonably prudent individual traveling across the place in question would have been in the position of maintaining his/her balance or even avoided the fall?
20. What steps have been taken made by the management of Quick Bite to rectify the situation that Plaintiff argues brought about her injuries?

report

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