

	Plaintiff,	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – Docket No.:
vs.		<u>Civil Action</u>
	Defendant.	WRONGFUL DEATH INTERROGATORIES

TO:

Plaintiff, _____, provides the following answers to Defendant's Wrongful Death Interrogatories:

1. Set forth the following information as to the decedent:
 - a. full name;
 - b. any other names by which decedent had been known and the dates decedent was known by that name;
 - c. the date and place of decedent's birth;
 - d. whether decedent was ever married and, if so, the name and date of birth of decedent's spouse(s), as well as the date of any marriage(s);
 - e. the names and ages of decedent's children, if any;
 - f. decedent's address for the last five years, if different than the preceding interrogatory;
 - g. the names and ages of all persons with whom decedent resided at the time of the incident alleged in the Complaint; and
 - h. the extent of decedent's educational background, including schools, dates of attendance, and degrees received.

2. Please set forth, with regard to the decedent the following information concerning decedent's employment:
 - a. whether decedent was employed at the time of the incident complained of in the Complaint; if so, by whom;
 - b. the inclusive dates of employment and, if terminated, for what reason;
 - c. decedent's job title; and
 - d. the names and addresses of all of decedent's employers for the past ten years, if different than above.

3. Set forth the following information with regard to the person answering these Interrogatories:

- a. your full name;
- b. the date and place of your birth;
- c. whether you have ever been married and, if so, the name and date of birth of your spouse;
- d. the names and ages of your children, if any;
- e. your current address;
- f. educational background; and
- g. employment status (employer, title, annual salary) for the last 5 years.

4. Have you ever been involved as a plaintiff in any other lawsuit? If so, set forth the nature of the lawsuit, the venue, the docket number, the type of the case and the outcome.

5. Set forth the names and addresses of all persons who furnished information for these answers to interrogatories.

6. Do you intend to offer into evidence any photographs of the decedent at the time of trial?

- a. the date and place taken;
- b. the name and address of the person who took it;
- c. the reason it was taken;
- d. whether moving or still;
- e. the name of the person who has custody of it; and
- f. please supply a copy of each photograph.

7. State whether any written opinions or diagnoses (including doctors', hospital and s-ray reports) were given covering the decedent's health during decedent's life concerning injuries, diseases, conditions and illnesses other than the one involved in this litigation. If so, state the names and addresses of the parties giving same, the dates they were given, and the names and addresses of the persons possessing copies of said opinions or diagnoses. Attach a copy of each such opinion or diagnoses to your answers to these interrogatories.

8. State whether any of the foregoing injuries, diseases, conditions or illnesses had any permanent effect upon the decedent and, if so, state which disease, condition, illness or injury, and such permanent affect, and describe how each permanently manifested itself.

9. State whether the decedent had ever applied for or been refused insurance of any kind by reason of health, and state the name and address of each of the companies so refusing, the approximate date of such refusal, and the grounds of each such refusal.

10. State whether decedent received any income from investments, gifts and bequests, or other sources not already mentioned, during the ten-year period prior to death and, if so, set forth:

- a. the source and dates of such income;
- b. the amounts of said income, year by year; and
- c. the expenses incurred in connection with the receipt of said income.

11. Did any person contribute to the support and maintenance of the decedent? If so, give the names and addresses of all such persons, their relationship as to the decedent, and the amount contributed to the decedent in each year during the ten-year period prior to death.

12. Did the decedent, or any member of the decedent's family, keep records or accounts of decedent's personal, business or family expenses? If so, state the name and address of each person or organization presently having custody of such records or accounts.

13. If the decedent employed an accountant or bookkeeper during the five years prior to death, state the name and address of the same.

14. During the three years preceding death, were federal income tax returns filed by or on behalf of the decedent? If so, attaché hereto a copy of such federal income tax returns.

15. State the names, addresses, relationship to the decedent, and the dates of birth of all person who are claimed to have been dependent in whole or in part upon decedent for their support, maintenance or education at the time of decedent's death.

16. With regard to those allegedly dependent persons named in #15 above, state what education each such person received, giving the names and addresses of the educational institutions attended, the dates of attendance, any degree received, and the last grades successfully completed.

17. If any of the allegedly dependent persons named in #15 above are married, state the name and address of the spouse and the date and place of marriage.

18. State the occupation pursued, including the name and address of all employers, the dates engaged in such occupation, the nature of the work in such occupation, the annual wage or salary received, the annual gross income of each alleged dependent person named in #15 above, for each of the five years preceding the decedent's death.

19. As to each allegedly dependent person named in #15 above, state which, if any, regularly received money from the decedent, and with respect to each, state separately the amounts received and in what form such amounts were received in each of the five years preceding the decedent's death.

20. State any losses not heretofore mentioned which are claimed as damages in this suit.

21. Set forth the amount spent by decedent in each of the three years preceding death for each of the following categories of expense:

- a. Rental and upkeep of a house;
- b. Food;
- c. Clothing;
- d. Education;
- e. Transportation;
- f. Entertainment;
- g. Taxes;
- h. Interest; and
- i. Habits, hobbies and other personal expenses.

22. State the name, present address, date and place of birth and relationship to the decedent of all persons to whom it is claimed the decedent gave support and contribution prior to decedent's death.

23. Set forth the total amount of all expenses, including medical bills, burial and funeral expenses, which were paid or incurred as a result of the death of decedent. List in detail each item of such expense, the date and manner of payment, the name of each person paying such expense or any part thereof, and the name and address of each person to whom payment was made.

24. Did decedent leave a Last Will and Testament? If so, attach a copy hereto.

25. When did the decedent first become a patient of defendant?

26. Please state the reason why decedent became a patient of defendant?

CERTIFICATION

I hereby certify that the copies of the written reports or complete summaries of any oral reports of treating physicians or expert witnesses, annexed hereto, are exact copies of the entire written report or reports or complete summaries of any oral report or reports rendered by them; that the existence of other reports of treating physicians, expert witnesses, either written or oral, are unknown to me; and that if such reports become later known or available, I shall serve them promptly upon the propounding party, but in no case later than the time prescribed by the Court Rules.

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

Dated: