

INTERROGATORIES TO DEFENDANT  
(Slip/Trip/Fall)

1. Please state your full name, your present home address, your employer's name and business address, and the title you hold with the named defendant, or the capacity in which you are associated with said defendant.

Answer:

2. State the names and addresses of all persons known to you or to your insurance company or attorney who witnessed any part of the incident, or have knowledge of the events leading up to said incident, and give a brief description of all witnesses whose names or addresses are not known.

Answer:

3. Were any statements concerning the incident made to any police officer, private investigator, insurance company agent or adjuster, or anyone else? If so, state:

- a) The name, address and employer of the person to whom the statement was made;
- b) The date of each statement;
- c) Whether the statement was oral or written, and if oral, whether it was recorded;
- d) The name and address of the custodian(s) of each statement.

Answer:

4. Describe any photographs, movies, videotapes, diagrams or drawings taken or made by you or on your behalf of the scene, if any, the plaintiff(s), or anything related to the events alleged in the Complaint.

Answer:

5. Other than this incident, has any person reported slipping and/or tripping and/or falling in the area where this incident occurred during the five-year period prior to the date of this incident and/or during the two-year period subsequent to the date of this incident? If so, as to each such reported slip and/or trip and/or fall incident, please provide the following information:

- a) The date of each such incident;
- b) A brief description of each such incident, including the type of surface on which the person involved in each such incident slipped and/or tripped and/or fell;
- c) A brief description of the injuries suffered by any person involved in each such incident;
- d) Whether any of the incidents referred to above resulted in a claim and/or lawsuit, and if so, the name of each claimant, date of the filing of each such claim and/or lawsuit, the civil number, if any, and a summary of the disposition of each such claim or lawsuit.

Answer:

6. During the five-year period before this incident, did you receive any reports and/or complaints with regard to a condition of the floors and/or walking surfaces in the area where this incident occurred? If so, please state:

- a) The date of such complaint and/or report;
- b) Whether or not you have or maintained any documentary material of any kind or nature relating or referring to such complaints and/or reports;
- c) What action, if any, was taken by you with respect to such complaint and/or report.

Answer:

7. On the date of this incident, did you have a system or routine of any kind whereby the floors and/or stairs and/or carpeting and/or walking surfaces of the area where this incident occurred were inspected and/or maintained? If so, please state:

- a) A general description of such system or routine;
- b) The name, address, and particular duties of each person directly involved in such system or routine of inspection and/or maintenance in the general area where this incident occurred as of the date of this incident;
- c) The name, title, address and particular duties of each person responsible for the general supervision of the operation of such system or routine as of the date of this incident;
- d) The date on which such system or routine went into effect;
- e) Whether or not such system is presently in effect.

Answer:

8. As of the date of this incident, did the named defendant hire any other individual or entity to assist with maintenance or care of the area where this incident occurred? If so, please state:

- a) The name and address of each individual or entity;
- b) Describe generally the functions and/or duties of each individual or entity;
- c) Whether any agreement existed between the named defendant and any individual or entity, and if so, state the terms of any such agreement. (If in writing, in lieu of stating all terms, you may produce a copy of the agreement.)

Answer:

9. After this incident, was the floor and/or walking area and/or floor covering over the area where this incident occurred repaired and/or replaced and/or altered in any manner? If so, please state:

- a) A description of the nature of each repair and/or replacement and/or alteration;
- b) The name, title and address of each person, department, company and/or agency who repaired and/or altered such floor and/or walking area and/or floor covering over the area where this incident occurred;
- c) The reason for such repair and/or alteration;
- d) Whether or not such action was taken as a result of or following a complaint and/or other notification.

Answer:

10. On the date of this incident, was there any inspection made of the area where this incident occurred prior to the time of this incident? If so, please state:

- a) The name, address, occupation and employer of each person making each such inspection;
- b) The date and time each such inspection was made;
- c) Whether there is a written log or other documentation referencing each such inspection;
- d) The name, address, occupation and employer of the person having present custody of any written log or other documents referencing each such inspection.

Answer: