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5 Attorneys for Plaintiff(s),
[CLIENT'S NAME(S)]

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF [COUNTY], [DISTRICT]

10 [PLAINTIFF(S)], an individual,
11 Plaintiff,
12 vs.
13 [DEFENDANT(S)], and DOES 1 to [#],
inclusive,
14 Defendants.

Case No. []
Honorable []
[Dept. [#]]

**PLAINTIFF'S SPECIAL
INTERROGATORIES, SET ONE**

Action Filed: []
Trial Date: []

16 PROPOUNDING PARTY : PLAINTIFF [CLIENT'S NAME]
17 RESPONDING PARTY : DEFENDANT [DEFENDANT'S NAME]
SET NUMBER : ONE

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19 Plaintiff [CLIENT'S NAME] hereby requests that Defendant [DEFENDANT'S
20 NAME] answer fully the following set of Special Interrogatories, in writing and under oath,
21 pursuant to California Code of Civil Procedure Section 2030, et seq., and that said answers
22 be signed, verified, and served within thirty (30) days after service.

23 **DEFINITIONS**

24 A. "DEFENDANT," "YOU" and "YOUR" shall mean Defendant
25 [DEFENDANT'S NAME].

26 B. "PLAINTIFF" shall mean PLAINTIFF [CLIENT'S NAME].

27 C. "IDENTIFY" when referring to an individual, corporation, or other entity shall
28 mean to set forth the name and telephone number, and if a corporation or other entity, its

1 principle place of business, or if an individual, the present or last known home address, his
2 or her job title or titles, by whom employed and address of the place of employment.

3 D. "SUBJECT INCIDENT" means and refers to the incident on [Date of
4 Incident] described in PLAINTIFF's Complaint upon which this suit is founded.

5 E. "SUBJECT PREMISES" means and refers to the property on which the
6 SUBJECT INCIDENT occurred, located at [Premises Address].

7 F. "SUBJECT CONDITION" means and refers to [Describe Condition].

8 **SPECIAL INTERROGATORIES**

9 **SPECIAL INTERROGATORY NO. 1:**

10 If you contend that YOU did not own the SUBJECT PREMISES at the time of the
11 SUBJECT INCIDENT, state all facts upon which YOU base YOUR contention.

12 **SPECIAL INTERROGATORY NO. 2:**

13 If you contend that YOU did not lease the SUBJECT PREMISES at the time of the
14 SUBJECT INCIDENT, state all facts upon which YOU base YOUR contention.

15 **SPECIAL INTERROGATORY NO. 3:**

16 If you contend that YOU did not occupy the SUBJECT PREMISES at the time of the
17 SUBJECT INCIDENT, state all facts upon which YOU base YOUR contention.

18 **SPECIAL INTERROGATORY NO. 4:**

19 If you contend that YOU did not control the SUBJECT PREMISES at the time of the
20 SUBJECT INCIDENT, state all facts upon which YOU base YOUR contention.

21 **SPECIAL INTERROGATORY NO. 5:**

22 If you contend that YOU were not negligent in the use of the SUBJECT PREMISES
23 at the time of the SUBJECT INCIDENT, state all facts upon which YOU base YOUR
24 contention.

25 **SPECIAL INTERROGATORY NO. 6:**

26 If you contend that YOU were not negligent in the maintenance of the SUBJECT
27 PREMISES at the time of the SUBJECT INCIDENT, state all facts upon which YOU base
28 YOUR contention.

1 **SPECIAL INTERROGATORY NO. 7:**

2 If you contend that YOUR negligence was not a substantial factor in causing harm to
3 PLAINTIFF, state all facts upon which you base your contention.

4 **SPECIAL INTERROGATORY NO. 8:**

5 If you contend that PLAINTIFF did not suffer damages as a result of the SUBJECT
6 INCIDENT, state all facts upon which you base your contention.

7 **SPECIAL INTERROGATORY NO. 9:**

8 If you contend that PLAINTIFF did not suffer past economic loss as a result of the
9 SUBJECT INCIDENT, state all facts upon which you base your contention.

10 **SPECIAL INTERROGATORY NO. 10:**

11 If you contend that that PLAINTIFF did not suffer past lost earnings as a result of the
12 SUBJECT INCIDENT, state all facts upon which you base your contention.

13 **SPECIAL INTERROGATORY NO. 11:**

14 If you contend that that PLAINTIFF did not suffer past lost profits as a result of the
15 SUBJECT INCIDENT, state all facts upon which you base your contention.

16 **SPECIAL INTERROGATORY NO. 12:**

17 If you contend that that PLAINTIFF did not incur past medical expenses as a result
18 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

19 **SPECIAL INTERROGATORY NO. 13:**

20 If you contend that that PLAINTIFF will not suffer future economic loss as a result
21 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

22 **SPECIAL INTERROGATORY NO. 14:**

23 If you contend that that PLAINTIFF will not suffer future lost earnings as a result of
24 the SUBJECT INCIDENT, state all facts upon which you base your contention.

25 **SPECIAL INTERROGATORY NO. 15:**

26 If you contend that that PLAINTIFF will not suffer future lost profits as a result of
27 the SUBJECT INCIDENT, state all facts upon which you base your contention.

28 **SPECIAL INTERROGATORY NO. 16:**

1 If you contend that that PLAINTIFF will not incur future medical expenses as a result
2 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

3 **SPECIAL INTERROGATORY NO. 17:**

4 If you contend that that PLAINTIFF did not suffer past noncomomic loss as a result of
5 the SUBJECT INCIDENT, state all facts upon which you base your contention.

6 **SPECIAL INTERROGATORY NO. 18:**

7 If you contend that that PLAINTIFF did not suffer past physical pain as a result of
8 the SUBJECT INCIDENT, state all facts upon which you base your contention.

9 **SPECIAL INTERROGATORY NO. 19:**

10 If you contend that that PLAINTIFF did not suffer past mental suffering as a result
11 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

12 **SPECIAL INTERROGATORY NO. 20:**

13 If you contend that that PLAINTIFF will not suffer future noncomomic loss as a result
14 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

15 **SPECIAL INTERROGATORY NO. 21:**

16 If you contend that that PLAINTIFF will not suffer future physical pain as a result of
17 the SUBJECT INCIDENT, state all facts upon which you base your contention.

18 **SPECIAL INTERROGATORY NO. 22:**

19 If you contend that that PLAINTIFF will not suffer future mental suffering as a result
20 of the SUBJECT INCIDENT, state all facts upon which you base your contention.

21 **SPECIAL INTERROGATORY NO. 23:**

22 If you contend that that PLAINTIFF was negligent at the time of the SUBJECT
23 INCIDENT, state all facts upon which you base your contention.

24 **SPECIAL INTERROGATORY NO. 24:**

25 If you contend that that PLAINTIFF's negligence was a substantial factor in causing
26 PLAINTIFF's harm, state all facts upon which you base your contention.

27 **SPECIAL INTERROGATORY NO. 25:**

28 If you contend that that another party to this lawsuit was negligent at the time of the

1 SUBJECT INCIDENT, state all facts upon which you base your contention.

2 **SPECIAL INTERROGATORY NO. 26:**

3 If you contend that that another party to this lawsuit's negligence was a substantial
4 factor in causing PLAINTIFF's harm, state all facts upon which you base your contention.

5 **SPECIAL INTERROGATORY NO. 27:**

6 If you contend that that a non-party person or entity was negligent at the time of the
7 SUBJECT INCIDENT, state all facts upon which you base your contention.

8 **SPECIAL INTERROGATORY NO. 28:**

9 If you contend that that a non-party's negligence was a substantial factor in causing
10 PLAINTIFF's harm, state all facts upon which you base your contention.

11 **SPECIAL INTERROGATORY NO. 29:**

12 Identify all previous incidents that occurred in substantially the same manner as the
13 SUBJECT INCIDENT at the SUBJECT PREMISES, within the ten years prior to the
14 SUBJECT INCIDENT.

15 **SPECIAL INTERROGATORY NO. 30:**

16 Identify all subsequent incidents that occurred in substantially the same manner as
17 the SUBJECT INCIDENT at the SUBJECT PREMISES, since the SUBJECT INCIDENT.

18 **SPECIAL INTERROGATORY NO. 31:**

19 Describe all policies and procedures, with respect to maintenance, YOU followed
20 within twenty-four hours prior to the SUBJECT INCIDENT.

21 **SPECIAL INTERROGATORY NO. 32:**

22 Describe all efforts made by YOU to remedy the SUBJECT CONDITION, following
23 the SUBJECT INCIDENT.

24 **SPECIAL INTERROGATORY NO. 33:**

25 Describe all training procedures with regard to maintenance of the SUBJECT
26 PREMISES.

27 **SPECIAL INTERROGATORY NO. 34:**

28 Describe the flooring materials, both artificial and natural, of the area in which the

1 SUBJECT INCIDENT occurred.

2 **SPECIAL INTERROGATORY NO. 35:**

3 Describe the lighting, both artificial and natural, of the area in which the SUBJECT
4 INCIDENT occurred.

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7 DATED: May 24, 2020

SELARZ LAW CORP.

8

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By: _____

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Daniel E. Selarz, Esq.

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Attorneys for Plaintiff(s),

[Client's Name(s)]

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PROOF OF SERVICE
Case No. [_____]

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I, the undersigned, declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 24, 2020 I served the foregoing document(s) **PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 24, 2020, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Daniel E. Selarz

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SERVICE LIST

SENT VIA U.S. MAIL

[Attorney's Name]
[Law Firm Name]
[Street Address]
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]