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ANSWERING INTERROGATORIES INSTRUCTIONS TO PI CLIENTS

- 1. WHAT ARE INTERROGATORIES?** The other side has served us with interrogatories, which are simply questions which must be answered. You must return your answers to us within fifteen (15) days, written in the space provided after each question. You are required to answer interrogatories under the rules of the court. Please sign the signature page where provided and return it with your answers.
- 2. PROCEDURES.** After we have received your answers, we will add additional information we know and type your answers on the original set of interrogatories. The interrogatories are then sent to the opposing party. We cannot leave out any witnesses or any information because it will eventually hurt your case. The penalty for leaving out any witness is that that witness may not testify at trial and, therefore, cannot help you.
- 3 POST-OCCURRENCE WITNESSES.** Post-occurrence witnesses mean all people who saw you after the incident who might be able to testify to how your condition was before the incident as well as after the incident. This would include your employer, your friends, and neighbors who could tell about your condition and also your employment. Other witnesses would include persons who were at the scene right after the accident occurred.
- 4. DOCTOR BILLS.** We will need to know the current bill to date for the total amount of services growing out of charges for this incident. Be sure it is the total amount and for this occurrence only. When we request bills, we mean all the bills from all hospitals, doctors, druggists, physical therapists, etc. Please do not leave any of these out of your answers.
- 5. OTHER ACCIDENTS AND INJURIES.** When we ask you about prior incidents (incidents or injuries before this one), be sure that you indicate the nature of the incident and the nature of your injuries. It is very important that you indicate all previous incidents and all previous injuries. This means such injuries as childhood falls, football injuries, war injuries and the like. Failing to tell the truth could lead to losing your case. If you have had a previous back or neck injury, for example, there is nothing wrong with this fact, as you may be more susceptible or more easily injured in a second incident. However, the failure to tell this could easily give the impression that you were trying to hide something or lie. You must always tell the truth.

6. SPECIAL DAMAGES. The phrase "special damages" simply means all your expenses. When the question is asked to list all special damages or all losses, then list all of your expenses from the incident, including such things as the following: (1) Doctor bills; (2) Hospital bills; (3) Car repair; (4) Physical therapy bills; (5) Clothing loss; (6) Costs of trips to the doctor and hospital; (7) Wage or earning loss; (8) Nursing expenses; (9) Car rental; (10) Housekeeping expenses; (11) Brace, collar, wheelchair, crutches, etc. expenses; (12) Babysitting expenses; and (13) Drugs and medicine expenses.

7. ANSWER ALL QUESTIONS IF POSSIBLE. There are some questions on the interrogatories, for example, concerning whether or not photographs have been taken which only we know about. We will answer these questions when we receive your answers. However, if you know about photographs, or know anything about any of the questions, you should answer so on a separate sheet of paper.