

- (c) All persons who last examined or inspected the place where the accident occurred, prior to the accident;
 - (d) All persons who first examined or inspected the place where the accident occurred, subsequent to the accident;
 - (e) As to Statements obtained by or on behalf of defendant, or any other Statements known or believed by defendant to have been obtained from any of the persons identified in (a),(b),(c), and/or (d) above, identify all persons providing such Statements; whether the said Statements were written or oral, and identify all persons in possession, custody and/or control of such Statements
2. Except as set forth in 1 above, identify, by name, title, residence and business address(es) and their employers, all persons, including potential expert witnesses (and their field of expertise), from whom defendant or anyone acting on defendant's behalf has obtained any information as to how the accident happened, the cause of the accident or alleged resulting injuries.
3. Did defendant, or anyone acting on behalf of the defendant, receive any reports or complaints from any source during the six (6) months prior to the accident, concerning the conditions of the place where the accident occurred? If so, state:
- (a) When:
 - (b) From whom received:
 - (c) The nature of each such report or complaint:

- (d) Any action(s) taken by defendant in response thereto:

 - (e) The name, address and job title of the person(s) who has custody, possession and/or control of such reports or complaints.
4. Were any repairs or changes made to the place where the accident occurred (or instrumentality involved in the accident) after the accident occurred? If so, state when they were made, the kind of repairs or changes made, and identify who made such repairs or changes, as well as whose decision it was to initiate the repairs or changes.
5. Set forth the names and addresses of all persons, other than the plaintiff, who have made a claim against the defendant(s) for injuries or damages allegedly occurring in substantially the same area or manner, during the two (2) year period preceding this accident. If lawsuits have been filed concerning any of those claims, state the Commonwealth or State, County, court term and number.
6. (a) At the time of the accident, were the premises where the accident occurred possessed, controlled and/or maintained by the defendant(s)? If not, identify who did possess, control and/or maintain them.
- (b) Identify, including name, title, residence and business address(es) the person(s) who last maintained and/or cleaned the premises (or instrumentality) where the accident occurred.
7. Are the premises where the accident occurred owned or leased by the defendant(s). If leased, state:
- (a) From whom said premises are leased:

 - (b) Dates of said lease:

8. State any violations of City Ordinances or Codes for which defendant or anyone acting on defendant's behalf were cited regarding the alleged accident as well as the dates of said violations.

9. Were there any signs, barriers or anything else at or near the scene of the alleged accident (or instrumentality) warning of the conditions existing thereon? If so, state:
 - (a) When said warnings were placed at the scene and by whom:

 - (b) Describe exactly what the warning was and the exact dimensions of said warning:

 - (c) The exact location of said warning.

10. State whether or not the defendant(s) (or anyone acting on behalf of the defendant(s)) are in the possession, custody and/or control of or know of the existence of any photographs, sketches, reproductions, charts, maps or diagrams of the scene of the accident, and if so, state:
 - (a) The date(s) they were taken or made:

 - (b) The name, title, residence and business address of the person(s) taking them and in the possession, custody and/or control of them:

 - (c) The subject or object of the particular site or view of each of them.

11. Is defendant's name correct as it appears in the complaint? If not, provide the correct name for purposes of litigation.
12. State the weather conditions on the day of and the day before the accident and whether you allege that the weather conditions contributed to the happening of Plaintiff's accident.
13. Identify, by name, title, residence and business address(es), the persons supplying the answers to these Interrogatories and whether they do so from personal knowledge. Otherwise, state the sources from which the information was obtained.
14. Was/were defendant(s) insured by any carrier for liability and/or excess (i.e. "umbrella") benefits applicable to Plaintiff's accident? If so, identify by name and address the insurance carrier and the exact name of the insured and the amount of applicable liability insurance benefits. If self-insured, for all or any monetary part of a liability claim, so state (including the limits).
15. Was any videotaping performed on the day of this accident at the location where the accident occurred? If so, was there any type of log, record, compilation or other documentation of the videotaping performed; identify by name, title, residence and business address, the person who is charged with the care, custody, possession and/or control of the recording(s).
16. If you contend that plaintiff was guilty of comparative/contributory negligence, then fully and specifically describe upon what conduct, acts or omissions of plaintiff you base your contention. If you contend that any other party, person and/or entity is responsible for the plaintiff's injuries, damages and/or losses, then fully and specifically describe upon what conduct, acts or omissions of such party, person and/or entity you base your contention.

17. If you have engaged, or expect to engage, healthcare professionals and/or other expert witnesses (i.e. accident reconstructionists), whom you intend to have testify at trial on your behalf on any matter pertaining to this action, state:

- (a) The name of the expert;
- (b) The expert's professional address;
- (c) The expert's occupation;
- (d) The expert's specialty;
- (e) The expert's qualifications (i.e. Curriculum Vitae);
- (f) The topic or subject matter upon which expert is expected to testify;
- (g) The substance of the facts to which the expert is expected to testify;
- (h) The substance of the opinion to which the expert is expected to testify;

- (i) A summary of the grounds for each opinion the expert is expected to testify.
18. If you have engaged, or expect to engage, healthcare professionals and/or other expert witnesses (i.e. accident reconstructionists) for opinion(s), either oral or written, whom you do not intend to have testify at trial on your behalf, please state:
- (a) The name of the expert;
 - (b) The expert's professional address;
 - (c) The expert's occupation;
 - (d) The expert's specialty;
 - (e) The expert's qualifications (i.e. Curriculum Vitae);
 - (f) The topic or subject matter of the expert witness' oral or written report;
 - (g) The location of and/or whom has the care, custody, possession and/or control of the expert witness' oral or written report made to anyone other than yourself (i.e. an insurance company) providing an identity and address.

19. If you, your attorney or any representative of yours, conducted any sound, photographic, motion picture film, personal sight or any other type of surveillance of the Plaintiff(s), state:
- (a) By whom (name and address of company and individual);
 - (b) The date(s) of such surveillance;
 - (c) The time(s) of such surveillance;
 - (d) The location(s) of such surveillance;
 - (e) The method by which such surveillance was made;
 - (f) A summary of what such surveillance reveals.
20. At the time of the alleged accident or immediately thereafter, did you (or your agent(s), servant(s), worker(s) and/or employee(s)) have any conversation(s) with or make any statement(s) to any of the parties or witnesses, or did any of them make any statement(s) to you or in your presence. If so, state the substance of any such conversation(s) or statement(s) and identify in whose presence it occurred.

21. Identify any healthcare professionals' records your are in the possession, custody and/or control of.

Name of Attorney
Attorney for Plaintiff(s)
Identification No.:
Address:
Telephone No.:
Fax No.:
e-mail address:

I _____, subject to the penalties of 18 Pa C.S.A. §4904, relating to unsworn falsification to authorities, state the attached answers and/or documents are submitted in response to the foregoing Interrogatories and/or Requests for Production of Documents and that to the best of my knowledge, information and belief they are true and complete.

Signature