

HOW TO RESPOND TO INTERROGATORIES

- Interrogatories are a list of questions you must answer in writing, and your answers must be signed in front of a notary.
- Interrogatories are part of “Discovery,” which is very common in court cases. If you are served with discovery, such as Interrogatories, you are required to respond by the stated deadline. If you do not respond, the judge in your case will probably order you to respond. The judge may also require you to pay the other side’s attorney fees or even hold you in contempt of court if you continue to refuse to respond to discovery.
- You may not be able to answer all of the Interrogatories. Because discovery occurs in almost all cases, many attorneys have a standard list of Interrogatories that they cut and paste for every case so not every Interrogatory will apply to your case. If you cannot answer an Interrogatory do not just leave it blank or write “N/A.” Doing that may cause the other party or the judge to think you are refusing to answer. Instead, explain why you cannot answer. For example:

Q: Describe your current work schedule.

A: I do not have a current work schedule because I am unemployed.

Q: List the name and account number for each bank where you have an account.

A: I do not have any bank accounts.

- Sometimes an Interrogatory asks for very sensitive information, such as a password, a Social Security Number, or private medical information. If you have a concern about providing a response with sensitive information you will need to file a request for the judge to review the Interrogatory and provide you and the other party with instructions about how to protect your sensitive information.
- Interrogatories are usually “continuing,” which means that if something changes you must promptly update your answer. For example, if you were unemployed at the time you answered the Interrogatory above about your work schedule, but then you get a job, you should update your answers with the new information.
- Finally, DO NOT file your answers to discovery. You should make a copy of all of your answers to keep for your records and send your original response to the other party or their attorney if they are represented. The only thing you should file is a Certificate of Service stating the date you sent the other party your responses.

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Plaintiff,

v.

Defendant.

CIVIL ACTION
FILE NUMBER: _____

RESPONSE TO FIRST CONTINUING INTERROGATORIES

My name is _____, and I am the Plaintiff/Defendant in the above-styled action. I respond to the First Continuing Interrogatories served on me as follows:

GENERAL OBJECTIONS

- A. I object to each interrogatory to the extent that it purports to require the release of information which is protected by the attorney-client privilege, the attorney work product doctrine, is prepared in anticipation of litigation or trial by or for a party of for that party's representative, or is otherwise protected by any other discovery privilege recognized under the Georgia Civil Practice Act or the laws of the State of Georgia.
- B. I object to each interrogatory to the extent that it purports to impose a duty or obligation upon me that is not imposed by the Georgia Civil Practice Act.
- C. I object to each interrogatory to the extent that it purports to require me to identify each document that is responsive to a request when documents are produced as they are kept in the ordinary course of business. Such a requirement is unduly

burdensome, and the other party may not impose that requirement pursuant to the Georgia Civil Practice Act.

- D. I object to each interrogatory to the extent that it is vague, ambiguous, overly broad, unduly burdensome, oppressive, or impossible to answer fully.
- E. I object to each interrogatory to the extent that it seeks information that is confidential or which is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.
- F. I object to each interrogatory to the extent that it seeks confidential, proprietary, or trade secrets information from me.
- G. I object to each interrogatory to the extent that the information sought is the subject of continuing investigation.
- H. I object to each interrogatory to the extent that it seeks information that is protected by patient confidentiality, Peer Review Privilege, O.C.G.A. § 31-7-133, or the Medical Review Committee Privilege, O.C.G.A. § 31-7-143.
- I. I object to each interrogatory to the extent that it calls for the disclosure of information outside the scope of the time, place, subject matter, and circumstances of the occurrences mentioned or complained of in the Complaint or Counterclaim against me.

WITHOUT WAIVING THESE DEFENSES, I RESPOND AS FOLLOWS:

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Dated this _____ day of _____, 20_____.

Signature

Print Name

Address/Phone/Email:

VERIFICATION

_____ appeared before the undersigned officer, who is authorized to administer oaths, and said under oath that they have read the foregoing *Response to First Continuing Interrogatories*, and that the facts in it are true to the best of their knowledge and belief.

Signature

Subscribed and sworn to before me

on _____, 20__.

Notary Public

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Plaintiff,

v.

Defendant.

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FILE NUMBER: _____

CERTIFICATE OF SERVICE OF DISCOVERY

On _____ (date) I sent my Response to

First Continuing Interrogatories to the other party. It was addressed as follows:

Signature

Print Name

Address/Phone/Email:

