

IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

_____ , Plaintiff,	Case No.: _____
v.	
_____ , Defendant.	

**DEFENDANT’S RESPONSE TO PLAINTIFF’S FIRST AND CONTINUING  
INTERROGATORIES**

My name is \_\_\_\_\_, and I am the Defendant in the above styled case,  
and responds to Plaintiffs’ requests as follows:

**GENERAL OBJECTIONS**

1. Defendant objects to each request 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 Federal Rules of Civil Procedure or the laws of the State of Georgia.
2. Defendant objects to each request 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.
3. Defendant objects to each request to the extent that it purports to impose a duty or obligation upon Defendant that is not imposed by the Georgia Civil Practice Act.
4. Defendant objects to each request to the extent that it purports to require Defendant to

identify each document which 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 Plaintiff may not impose that requirement pursuant to the Georgia Civil Practice Act.

5. Defendant objects to each request to the extent it requires Defendant to provide information that may be obtained by Plaintiff from another source that is more convenient, less expensive, or less burdensome.
6. Defendant objects to each request to the extent that it is vague, ambiguous, overly broad, unduly burdensome, oppressive, or impossible to answer fully.
7. Defendant objects to each request 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.
8. Defendant objects to each request to the extent that it seeks confidential, proprietary, or trade secrets information from Defendant.
9. Defendant objects to each request to the extent that the information sought is the subject of continuing investigation by Defendant.
10. Defendant objects to each request 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.
11. Defendant objects to each request 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.
12. Defendant objects to each request to the extent that Plaintiff does not describe the documents to be produced by item or category and that each item or category to be produced, to the extent any item or category of documents is described, is not described with reasonable particularity.

**WITHOUT WAIVING THE FOREGOING, DEFENDANT RESPONDS AS FOLLOWS:**

1. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

2. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

3. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

4. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline

- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

5. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

6. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

7. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

8. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

9.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

10.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

11.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

12.

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

13. \_\_\_\_\_

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

14. \_\_\_\_\_

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

15. \_\_\_\_\_

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

16. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

17. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

18. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

19. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline

- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

20. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

21. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

22. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

23. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

24.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

25.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

26.

- 
- 
- 
- 
- Not Applicable     Refer to attached list, chart, table or timeline
  - Refer to document provided in response to *Plaintiff's Notice to Produce*
  - OBJECTION# \_\_\_\_\_ listed above applies to this request

27.

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

28.

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

29.

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

30.

---

---

---

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

31. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

32. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

33. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

34. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline

- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

35. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

36. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- Not Applicable     Refer to attached list, chart, table or timeline
- Refer to document provided in response to *Plaintiff's Notice to Produce*
- OBJECTION# \_\_\_\_\_ listed above applies to this request

Additional responses are attached on a separate sheet.

Dated: \_\_\_\_\_

\_\_\_\_\_  
 Defendant, Pro se    *[Signature]*  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 \_\_\_\_\_  
 Phone: \_\_\_\_\_  
 Email: \_\_\_\_\_

IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

\_\_\_\_\_,  
Plaintiff,  
v.  
\_\_\_\_\_,  
Defendant.

Case No.: \_\_\_\_\_

**VERIFICATION**

My name is \_\_\_\_\_ I hereby swear or affirm, before a notary public, that I have read the *Defendant's Responses to Plaintiff's/Plaintiff's First and Continuing Interrogatories* and the facts stated in the document are true.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Defendant, Pro se [Signature]

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Subscribed and sworn before me on  
\_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

IN THE SUPERIOR COURT OF GWINNETT COUNTY

STATE OF GEORGIA

\_\_\_\_\_,  
Plaintiff,  
v.  
\_\_\_\_\_,  
Defendant.

Case No.: \_\_\_\_\_

**CERTIFICATE OF SERVICE OF DISCOVERY**

This will certify that Defendant has today served upon Plaintiff *Defendant's Responses to Plaintiff's Interrogatories* by sending via US Mail, postage prepaid, addressed as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Dated: \_\_\_\_\_

\_\_\_\_\_  
Defendant, Pro se [Signature]

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

## HOW TO FILE YOUR DISCOVERY RESPONSES

---

### **\*\*\*Important\*\*\***

Any document you file with the Clerk of the Court becomes public record that can be accessed by anyone. **ONLY file proof of service and your notarized verification when responding to discovery.**

1. Double check you have signed and dated your responses.
  2. Make 1 copy of your responses for your own records.
  3. File the original VERIFICATION and CERTIFICATE OF SERVICE with the Clerk of Superior Court. Ask for a copy showing the date stamp.
  4. Mail your original responses and a the date-stamped copy of the Verification and Certificate of Service to the opposing party's attorney, or to the Plaintiff if he/she is representing themselves.
- It is recommended you send discovery to the opposing party via United States Certified Mail, return receipt requested. However, you can send it via regular First Class mail.