

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

INJURED PARTY,)	
)	
Plaintiff,)	
)	
vs.)	No: 00 L 0000
)	
XXXXX XXXXX XXXXX XXX.,)	
)	
Defendant.)	

**PLAINTIFF’S FIRST SET OF INTERROGATORIES TO DEFENDANT,
XXXXX XXXXX XXXX.**

Plaintiff, INJURED PARTY, by his attorneys, ROSENFELD INJURY LAWYERS, Serves Defendant with the following written Interrogatories and propounds Defendant to answer them fully under oath and signed by the Defendant within twenty-eight (28) days from receipt thereof:

1. Please identify by name and title each and every person who has answered or helped answer these Interrogatories.

ANSWER:

2. Please list the date of birth, residence address, social security number, job responsibilities and years of employment with aforementioned business entity, of any and all individuals listed in response to interrogatory number one (1).

ANSWER:

3. Please identify the owner of the “forklift” causing the alleged injury to the plaintiff as named in his complaint.

ANSWER:

4. Name the individual operating the forklift identified in the Complaint and his / her employer.

ANSWER:

5. Please state the full name and current residence address of each person that was present at the time of the accident and/or claims to have witnessed the accident.

ANSWER:

6. State the full name and current residence address of each person not named in interrogatory number five (5) above who was present and/or claims to have been present at the scene immediately before, at the time of, and/or immediately after the occurrence.

ANSWER:

7 Please state the name, address, and employer of each and every person known to you or your representatives who claims to have any knowledge of the circumstances surrounding the incident in question.

ANSWER:

8. Has Defendant, or anyone acting on its behalf, ever taken or received any statement, either orally or in writing, from any person, relating to this incident. If so, please state the name of the person who gave the statement, who took the statement, its date, its substance, and whether counsel may obtain a copy of any such statement.

ANSWER:

9. At the time of the incident in question, list any insurance, excess insurance, "umbrella" coverage, general liability insurance and other insurance in effect for Defendant.

ANSWER:

10. List the name, address and telephone number of each person likely to have discoverable information about the claims and defenses in this case, even if you do not intend on calling that person as a witness.

ANSWER:

11. Were any photographs, movies and/or videotapes taken of the scene of the occurrence or of the persons and said forklift involved? If so, state the date or dates on which such photographs, movies and/or videotapes were taken, the subject thereof, who

now has custody of them, and the name, address and occupation and employer of the person taking them.

ANSWER:

12. Identify any non-party who you claim is or may be liable to the claimant in part or in whole for the damages claimed but who has not been joined in the action as a party.

ANSWER:

13. Was there any manufacturing and / or maintenance defect which in any way contributed to the incident at issue?

ANSWER:

14. List all manuals/brochures/writings in Defendant's possession related to workplace safety, operator safety or operation of the forklift.

ANSWER:

15. State any and all safeguards Defendant had in place prior to Date, Year to prevent injuries to warehouse personnel.

ANSWER:

16. State any additional safeguards Defendant added after Date, Year to prevent injuries to warehouse personnel.

ANSWER:

17. Describe all training programs and/or certifications that Defendant provides or requires for forklift drivers/operators.

ANSWER:

19. State any other accidents involving the operator of the forklift that resulted in bodily injury? If so, state:

- (a) The date of the injury;
- (b) The nature of the accident;
- (c) The nature of the injury; and

(d) The injured party involved.

ANSWER:

20. Did Defendant, or anyone acting on its behalf, instruct or provide guidance to any employee on how to operate said forklift? If so, state:

- (a) Who was in charge of the instruction?
- (b) The date of the instruction.
- (c) Whether or not the instruction took place at Jewel Food Stores warehouse.
- (d) Whether or not any record or documentation of this instruction exists.

ANSWER:

21. Please state any civil suits brought against Defendant in the past six (6) years related to, bodily injury caused by forklifts owned / operated by Defendant.

ANSWER:

22. Describe any signage or warning labels that Defendant had placed on said forklift prior to Date, Year.

ANSWER:

23. State which agent or officer is in charge or ensures that Defendant is compliant with federal and state regulations regarding the operation of industrial machinery.

ANSWER:

24. Pursuant to Illinois Supreme Court Rule 213(f), provide the name and address of each witness who will testify at trial and all other information required for each witness.

ANSWER:

Pursuant to Supreme Court Rule 213 (i) you have a duty to seasonably supplement or amend your answers to these Interrogatories whenever new or additional information subsequently becomes known to you, your attorneys, investigators or other agents acting on your behalf.

ROSENFELD INJURY LAWYERS

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