

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

INJURED PARTY,)
)
 Plaintiff,)
)
 v.) No. 01 L 00000
)
 XXX XXXXX XXX.,)
)
 Defendant.)

PLAINTIFF'S ANSWERS TO 213F (1) (2) & (3) INTERROGATORIES

NOW COME the Plaintiff, INJURED PARTY, by and through its attorneys,
ROSENFELD INJURY LAWYERS, in response to the interrogatories propounded by
Defendant, XXX XXXXX XXX states the following:

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 as follows:

- (a) Identify the name and current address, or last known address, and telephone number of each lay witness and the subjects on which the witness will testify.
- (b) Identify the name and current address, or last known address, and telephone number of each and every independent expert witness, and with respect to each, please state:
 - (1) The subject matter on which the independent expert witness is expected to testify.
 - (2) Conclusions and opinions of each independent expert witness and the bases therefore;
 - (3) The qualifications of each independent expert witness, and;
 - (4) Provide all reports, notes, recordings, or any other documentation prepared by, or at the direction of, each independent expert witness.

**INJURED PARTY
ADDRESS
CITY, STATE ZIP**

Injured party is the plaintiff. The plaintiff will testify as to the facts of the occurrence, liability, causation and the plaintiff's damages. The plaintiff will testify as to his observations on the day of the occurrence of the scene of the accident, and all other facts that may relate to liability on the part of the defendant and their agents. The plaintiff will testify as to all conversations he had with the defendant and their agents, including all conversations he overheard made by the defendant. The plaintiff will testify as to all circumstances leading up to the accident. Plaintiff will testify about his employment at the time of the occurrence.

Plaintiff will specifically describe the circumstances leading up to the accident, including the date of the accident, the time that it occurred, and he will offer specific details regarding where, how and why the accident occurred. Consistent with all of the testimony rendered during his discovery deposition, plaintiff will describe what he was doing, and how he became injured. Plaintiff will describe his observations of the scene of the accident immediately before, at the time of the occurrence, and after the accident.

The plaintiff will testify as to his past and future: medical treatment, medical expenses, pain and suffering, disability and disfigurement, and loss of enjoyment of a normal life. The plaintiff will testify as to his past and future lost wages resulting from the injuries sustained in the occurrence. The plaintiff will testify consistent with his discovery depositions given in this cause.

Injured Party brother
Address
City, State Zip

Injured party's brother is the plaintiff's brother. Injured party's brother will testify as to the plaintiff's damages. Injured party's brother will testify as to her observations of the plaintiff prior to and subsequent to the incident on Date, Year. Injured party's brother will testify as to his observations of the plaintiff's: pain and suffering, medical treatment and disability. Injured party's brother will testify regarding the plaintiff's physical and work activities have been diminished as a result of the injuries sustained in this occurrence. Injured party's brother will base his testimony on his observations of the plaintiff and on his own knowledge of the job requirements for working at JDY, Inc.

Rosenfeld Injury Lawyers

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