

Involuntary Deviate Sexual Practices.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean the facts involved in the combined events and incidents which allegedly caused injury or damage to the plaintiff as a result of the alleged involuntary deviate sexual practices toward the plaintiff by the defendant.

1. Please state the legal status of the marriage between the plaintiff and the defendant at the time of the alleged occurrence, indicating:
 - a. Married and living together,
 - b. Married and living separately,
 - c. Court-approved separation,
 - d. Divorce proceedings filed, and
 - e. Awaiting final divorce decree?
2. What is the defendant's blood type?
3. Within one year prior to the alleged occurrence, if the plaintiff and the defendant had engaged in any act of sexual intercourse, please state as to each such act:
 - a. The frequency,
 - b. The time, and
 - c. The place.
4. Within one year prior to the alleged occurrence, if the plaintiff and the defendant had engaged in sexual conduct other than sexual intercourse, please state as to each such sexual conduct:
 - a. Frequency,
 - b. Time and place,
 - c. A description of any oral sex,
 - d. A description of any masturbation, including plaintiff to defendant and defendant to plaintiff,
 - e. Sodomy,
 - f. Bondage,
 - g. Sadism,
 - h. Masochism,
 - i. Multiple partners, including with spouse involved and separate from spouse,
 - j. Sexual acts with partner of same sex,
 - k. Prostitution,
 - l. Sexual acts with children or minors,
 - m. Photographing sexual acts, and
 - n. Videotaping sexual acts.
5. Within one year prior to the alleged occurrence, had the defendant ever requested the plaintiff's consent to engage in sexual conduct other than sexual intercourse?

6. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The defendant's kind and type of request for consent, whether oral, written or physical,
 - b. The frequency of each such request, and
 - c. An explanation of why consent was requested at some times and not other times.
7. Within one year prior to the alleged occurrence, had the plaintiff ever denied any request by the defendant for consent for sexual conduct other than sexual intercourse?
8. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The kind and type of denial, whether oral, written or physical,
 - b. The frequency, and
 - c. Each reason or explanation given.
9. At the time of the alleged occurrence, did the defendant and the plaintiff engage in the same sexual acts, other than sexual intercourse, as they had done before the alleged occurrence?
10. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. A description of each such act, and
 - b. The frequency of each such act.
11. At the time of the alleged occurrence, did the defendant use any force, including any oral threat, against the plaintiff before any attempt by the defendant to engage in sexual conduct other than sexual intercourse with the plaintiff?
12. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. Did the defendant threaten harm to the plaintiff,
 - b. Did the defendant threaten harm to any child of the plaintiff,
 - c. Did the defendant threaten harm to any property of the plaintiff,
 - d. Did the defendant threaten harm to any third party,
 - e. A description of the nature and extent of any force used, and
 - f. A description of the nature, extent and substance of any oral threat?
13. At the time of the alleged occurrence, did the defendant use any force, including any physical conduct, against the plaintiff before any attempt by the defendant to engage in sexual conduct other than sexual intercourse with the plaintiff?
14. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. Did the defendant beat or strike the plaintiff,
 - b. Did the defendant physically threaten to strike or hit the plaintiff,
 - c. Did the defendant hold down the plaintiff by physical force,
 - d. Did any third party hold down the plaintiff by physical force, and if so, identify the third party by name, address and any relationship to the plaintiff or the defendant, and
 - e. Did the defendant tie up or restrain the plaintiff?

15. At the time of the alleged occurrence, did the defendant use any force, including any intimidation, against the plaintiff prior to any attempt by the defendant to engage in sexual conduct other than sexual intercourse with the plaintiff?
16. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description in detail of each act of intimidation, and
 - The substance of any conversation between the defendant and the plaintiff, indicating who said what to whom as to any intimidation.
17. At the time of the alleged occurrence, did the defendant use any force, including any fraudulent act, against the plaintiff prior to any attempt by the defendant to engage in any sexual conduct other than sexual intercourse with the plaintiff?
18. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description of each fraudulent act,
 - Whether the defendant claimed that the defendant's conduct was in the plaintiff's best interest,
 - Whether the defendant claimed that the plaintiff had no legal right to refuse, and
 - Whether the defendant claimed that the defendant's conduct was necessary medical treatment.
19. At the time of the alleged occurrence, was it possible for the defendant to obtain or receive the plaintiff's consent?
20. If your answer to the preceding interrogatory is in the affirmative, please state as to the plaintiff's physical, mental and legal status:
- The plaintiff was conscious,
 - The plaintiff was not intoxicated,
 - The plaintiff was not mentally deficient,
 - The plaintiff was competent, and
 - The plaintiff was above the statutory age for consent.
21. At the time of the alleged occurrence, just prior to any sexual intercourse between the defendant and the plaintiff, did the defendant request, seek or attempt to obtain the plaintiff's consent to any sexual conduct other than sexual intercourse?
22. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description of any oral request, whether express or implied, indicating as to any conversation between the defendant and the plaintiff, who said what to whom, and
 - A description of any physical act or conduct on the part of the defendant, whether a physical motion or body language, which the defendant believed was a request for sexual intercourse.
23. At the time of the alleged occurrence, prior to any sexual intercourse between the defendant and the plaintiff occurred, did the plaintiff give or grant to the defendant any consent to any sexual conduct other than for sexual intercourse?

24. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral consent, whether express or implied, indicating as to any conversation between the plaintiff and the defendant, who said what to whom, and
 - b. A description of any physical act or conduct on the part of the plaintiff, whether a physical motion or body language, which the defendant believed was the plaintiff's consent for sexual conduct other than sexual intercourse.
25. At the time of the alleged occurrence, prior to any sexual intercourse between the defendant and the plaintiff occurred, did the plaintiff either orally or physically withdraw the plaintiff's consent to the defendant's engaging in any sexual conduct other than sexual intercourse with the plaintiff?
26. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral withdraw of consent, whether express or implied, indicating as to any conversation between the plaintiff and the defendant who said what to whom,
 - b. A description of any physical act or conduct on the part of the plaintiff, whether a physical motion or body language which the defendant understood or believed was the plaintiff's withdrawal of consent for sexual conduct other than sexual intercourse, and
 - c. The defendant's understanding or belief as to what the plaintiff meant by withdrawing consent.
27. Is it the defendant's contention, allegation or belief that the plaintiff's consent was not necessary for the defendant to engage in any sexual conduct other than sexual intercourse with the plaintiff?
28. If your answer to the receding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief.
29. At the time of the alleged occurrence, did the defendant physically engage in or attempt to engage in any sexual conduct other than sexual intercourse with the plaintiff?
30. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral sex, including cunnilingus or fellatio, which occurred,
 - b. A description of any masturbation, whether plaintiff to defendant or defendant to plaintiff, which occurred,
 - c. A description of any sodomy which occurred,
 - d. A description of any bondage which occurred,
 - e. A description of any sadism which occurred,
 - f. A description of any masochism which occurred,
 - g. A description of any sexual conduct with multiple partners, including with the spouse involved and separate from the spouse,
 - h. A description of any sexual conduct with a partner of the same sex,
 - i. A description of any prostitution which occurred,
 - j. A description of any sexual conduct with any child or a minor,
 - k. A description of any photographing of any sexual conduct,
 - l. A description of any videotaping of any sexual conduct, and
 - m. A description of any other intimate sexual conduct or activity which occurred.

31. At the time of and during the alleged occurrence, did the plaintiff, by any physical act or oral statement, indicate that the plaintiff did not want the defendant to engage in any sexual conduct other than sexual intercourse with the plaintiff?
32. If your answer to the preceding interrogatory is in the affirmative, please state whether the plaintiff:
- Pushed the defendant away,
 - Physically hit, struck, slapped or scratched the defendant,
 - Told the defendant that the plaintiff did not want to engage in any sexual conduct other than sexual intercourse,
 - Screamed or shouted at the defendant,
 - Screamed or shouted for help, and
 - Begged for the defendant not to engage in any sexual conduct other than sexual intercourse.
33. Within three hours after the alleged occurrence, please describe each act or statement relating to the conduct of the plaintiff, indicating whether the plaintiff:
- Remained with the defendant,
 - Demonstrated affection toward the defendant,
 - Engaged in subsequent sexual acts with the defendant,
 - Immediately left the place of the alleged occurrence,
 - Cried,
 - Fainted or became unconscious,
 - Yelled or screamed,
 - Asked the defendant to leave the place of the alleged occurrence,
 - Demanded that the defendant leave the place of the alleged occurrence,
 - Threatened the defendant,
 - Called the police, and
 - Called a third party, and if so, give the name and address of the third party.
34. Within three hours after the alleged occurrence, please describe each act or statement relating to the conduct of the defendant, indicating whether the defendant:
- Remained with the plaintiff,
 - Demonstrated affection toward the plaintiff,
 - Engaged in subsequent sexual acts with the plaintiff,
 - Immediately left the place of the alleged occurrence,
 - Apologized to the plaintiff,
 - Became unconscious or fell asleep,
 - Yelled or screamed,
 - Asked the plaintiff to leave the place of the alleged occurrence,
 - Threatened the plaintiff, and
 - Communicated with a third party, and if so, give the name and address of the third party.

35. Please describe in detail the condition of the place of the occurrence within three hours immediately after the alleged occurrence, indicating whether the place:
- Was disheveled,
 - Was in disrepair,
 - Contained broken objects, and
 - Was without significant disruption or damage.
36. Immediately after the alleged occurrence, did the plaintiff call or visit the police?
37. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date and time of day,
 - The name and address of the police office contacted, and
 - Whether a rape kit was used.
38. Immediately after the alleged occurrence, did the plaintiff go to any health care facility such as a hospital?
39. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date and time of day,
 - The name and address of each health care facility or hospital,
 - The name and address of each health care practitioner, including any nurse or doctor, and
 - Whether a rape test was performed.
40. Immediately after the alleged occurrence, did the defendant have any physical injuries due in any way to the alleged occurrence?
41. If your answer to the preceding interrogatory is in the affirmative, please state as to any such physical injury:
- Scratches,
 - Scrapes,
 - Bruises,
 - Cuts,
 - Bumps,
 - Broken bones, and
 - Any other physical injury.
42. Immediately after the alleged occurrence, did the defendant seek or receive any examination or treatment from any health care professional for any physical injury received by the defendant as a result of the occurrence?
43. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name and address of any health care institution examining or treating the defendant, and
 - The name, address and medical specialty of any health care professional examining or treating the defendant, whether physician, nurse, emergency medical technician, ambulance attendant, police officer, third party or other.

44. Within 48 hours after the alleged occurrence, did the defendant make any oral or written statement to anyone about the alleged occurrence?
45. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name, address and, if any, relationship to the defendant and the plaintiff,
 - The substance of any such oral statement, indicating who said what to whom,
 - The verbatim substance of any such statement in writing,
 - The date, time and place of the making of any such statement,
 - Whether any such statement was made to the plaintiff,
 - Whether any such statement was made to any health care professional,
 - Whether any such statement was made to any police officer, ambulance driver or other emergency governmental person, and
 - Whether any such statement was made to any third person.
46. Is it the defendant's contention, allegation or belief that the defendant was not physically present with the plaintiff at the time of the alleged occurrence?
47. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- The place where the defendant was, if not with the plaintiff, at the time of the alleged occurrence, and
 - The identity, including name and address, of each person who has any knowledge of the whereabouts of the defendant at the time of the alleged occurrence.
48. Is it the defendant's contention, allegation or belief that, at the time of the alleged occurrence, the plaintiff consented to the defendant's sexual conduct other than sexual intercourse with the plaintiff?
49. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- Whether the consent was express consent, and
 - Whether the consent was implied consent.
50. Is it the defendant's contention, allegation or belief that the plaintiff did not have a reputation for proper moral conduct?
51. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- A description of the plaintiff's reputation as to proper moral conduct, and
 - The identity, including name and address, of each person who has any knowledge of the plaintiff's reputation for proper moral conduct.
52. Is it the defendant's contention, allegation or belief that the defendant was entrapped, that is, lured into committing sexual intercourse with the plaintiff?
53. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- A description of each aspect of any such entrapment,

- b. The name, address and any relationship to the plaintiff and the defendant of the person luring the defendant,
 - c. The name and address of each person who has any knowledge of any such entrapment, and
 - d. Whether there was sufficient time available to accomplish the alleged conduct.
54. Is it the defendant's contention, allegation or belief that, at the time of the alleged occurrence, the defendant was impotent?
55. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- a. A description of the defendant's impotent condition,
 - b. The source of the defendant's condition of impotence, including physical disability, intoxication, drug use, fatigue or other, and
 - c. The name and address of each medical professional who will support the defendant's claim of impotence.
56. Is it the defendant's contention, allegation or belief that the defendant was insane at the time of the alleged occurrence?
57. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- a. A description of each aspect of the defendant's insanity,
 - b. The cause or basis of any such insanity,
 - c. The defendant's inability to distinguish right from wrong,
 - d. A description of the defendant's irresistible impulse where the actions of the defendant could not be controlled,
 - e. How and to what extent the defendant's unlawful act was the product of any mental defect or disease, and
 - f. The name and address of each medical professional who will support the defendant's claim of impotence.
58. Is it the defendant's contention, allegation or belief that the defendant's loss of memory of the facts of the alleged occurrence was due to intoxication?
59. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- a. The quantity of alcohol consumed,
 - b. The quantity of drugs consumed,
 - c. The place where the defendant drank or ingested any alcohol or drug, and
 - d. The name and address of each witness with knowledge of any such alcohol or drug intoxication.

Assault and Battery.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean the facts involved in the combined events and incidents which allegedly caused injury or damage to the plaintiff as a result of the alleged assault and battery or the attempted assault and battery of the plaintiff by the defendant.

1. Has the defendant committed, caused or inflicted any assault and battery, including any threatening, putting in fear, hitting, striking or hostile touching, on or against the plaintiff within the past three years?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to any such act of assault and battery:
 - a. The date and time of each such act,
 - b. The place of each such act,
 - c. A description of each such act,
 - d. The conduct of the defendant for a period from five minutes before each act until five minutes after each act, including what the defendant did and said,
 - e. The conduct of the plaintiff for a period from five minutes before each act until five minutes after each act, including what the plaintiff did and said,
 - f. The number of blows, bodily contacts or other aggressive acts,
 - g. Each object or thing used by the defendant to strike or touch the plaintiff,
 - h. The result of any such assault and battery, including any physical or mental injury or suffering to the plaintiff, and
 - i. The name and address of each person who witnessed or has knowledge of each such act.
3. Just before and at the time of the alleged occurrence, please describe each conversation and communication between the defendant and the plaintiff, giving:
 - a. The date and time of each,
 - b. The substance, indicating who said what to whom,
 - c. The tone of voice of the plaintiff and the defendant,
 - d. Gestures,
 - e. The location or place of each, and
 - f. The identification, including name and address, of each person who witnessed or has any knowledge of each such conversation and communication.
4. At the time of the alleged occurrence, please identify each attempt or effort by the defendant to inflict harm or injury on the plaintiff, stating as to each attempt or effort:
 - a. The date and time,
 - b. The place,
 - c. The name and address of each person who has any knowledge of each such attempt or attack,
 - d. The type of harm attempted,
 - e. Each weapon used,

- f. Each part of the plaintiff's body which was involved in each attempt or attack, and
 - g. Each part of the defendant's body used in each attempt or attack, including fist, open front hand, open back hand, fingers, arm, elbow, barefoot, shod foot, leg, knee, teeth, head, or other.
5. At the time of the alleged occurrence, did the defendant physically contact or touch the plaintiff?
6. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. What delivered contact or touched the plaintiff,
 - b. What part of the plaintiff's body received contact or any touching,
 - c. Describe the force of the contact or touching,
 - d. Describe the frequency and number of contacts or touchings,
 - e. Explain why the defendant physically contacted or touched the plaintiff,
 - f. Describe the plaintiff's response, both orally and physically, and
 - g. Describe any injuries to the plaintiff observed by the defendant, giving the type of injury, the body parts of the plaintiff which were injured and the severity of each injury.
7. If, at the time of the alleged occurrence, the defendant physically contacted or touched the plaintiff, please identify by name and address each witness to any injury received by the defendant, including:
 - a. Police,
 - b. Ambulance attendance,
 - c. Emergency medical technicians,
 - d. Nurses, such as admitting, triage, attending or recovery, and
 - e. Physicians, such as emergency room, operating room, recovery or postoperative.
8. If, at the time of the alleged occurrence, the defendant physically contacted or touched the plaintiff, please state as to the medical records of any injury to the defendant:
 - a. The custodian and location of the medical records of any health care practitioner, including any doctor, and
 - b. The custodian and location of the medical records of any health care facility, including any hospital.
9. Please state how the physical contact or touching made by the defendant against the plaintiff at the time of the alleged occurrence ended, stating:
 - a. Intervention by a third party,
 - b. Police arrived,
 - c. Defendant stopped voluntarily,
 - d. Plaintiff escaped,
 - e. Plaintiff stopped defendant, and
 - f. Other.
10. At the time of the alleged occurrence, did the defendant use any object or instrument in making physical contract against the plaintiff?

11. If your answer to the preceding interrogatory is in the affirmative, please describe each object and instrument used by the defendant:
 - a. Its dimensions, giving length, width and height,
 - b. Its weight,
 - c. Its color,
 - d. Its material composition,
 - e. Its shape, whether pointed, sharp, blunt, round or other,
 - f. Its normal use,
 - g. Its custodian, and
 - h. Its normal location.

12. If, at the time of the alleged occurrence, the defendant used any object or instrument in making physical contact against the plaintiff, please describe how the defendant used each such object or instrument:
 - a. Held in the defendant's hand or fist,
 - b. Swung,
 - c. Thrown,
 - d. Kicked, and
 - e. Other.

13. If, at the time of the alleged occurrence, the defendant made physical contact against the plaintiff, please explain each reason why the defendant inflicted harm and injury on the plaintiff.

14. If, at the time of the alleged occurrence, the defendant made physical contact against the plaintiff, please describe each act, statement, insult or conduct by the plaintiff which caused or incited the defendant's physical contact against the plaintiff, including, but without limitation:
 - a. Any verbal attack,
 - b. Any physical attack,
 - c. Any conduct, such as arguing or refusing to help around the house,
 - d. Any staying late out of the house,
 - e. Any excessive working hours,
 - f. Any adultery or intimate sexual relations with someone other than the defendant,
 - g. Any excessive spending of money,
 - h. Any excessive saving of money,
 - i. Any insulting or embarrassing conduct, and
 - j. Any other cause or reason for incitement.

15. Prior to the time of the alleged occurrence, had there ever been an argument or dispute which was related by subject matter to the alleged occurrence?

16. If your answer to the preceding interrogatory is in the affirmative, please state full details.

17. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence against any former spouse or significant other of the plaintiff having to do with the defendant's relationship to the plaintiff?

18. If your answer to the preceding interrogatory is in the affirmative, please state as to each such incident, dispute or act:
- The name and address of each person involved or affected,
 - Each date and time,
 - Each location,
 - Each reason or explanation by the defendant for each such incident, dispute or act,
 - A description of each incident, dispute or act,
 - A description of any personal injury inflicted by the defendant,
 - A description of any property damage done by the defendant,
 - The name and address of each person having any knowledge of each such incident, dispute or act, and
 - How and in what manner each such incident, dispute or act ended.
19. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence against any child having to do with the defendant's relationship to the plaintiff?
20. If your answer to the preceding interrogatory is in the affirmative, please state as to each incident, dispute or act:
- The name and address of each person involved or affected,
 - Each date and time,
 - Each location,
 - Each reason or explanation by the defendant for each such incident, dispute or act,
 - A description of each incident,
 - A description of any personal injury inflicted by the defendant,
 - A description of any property damage done by the defendant,
 - The name and address of each person having any knowledge of each such incident, dispute or act, and
 - How and in what manner each such incident, dispute or act ended.
21. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence against any friend or acquaintance of the plaintiff having to do with the defendant's relationship to the plaintiff?
22. If your answer to the preceding interrogatory is in the affirmative, please state as to each incident, dispute or act:
- The name and address of each person involved or affected,
 - Each date and time,
 - Each location,
 - Each reason or explanation by the defendant for each such incident, dispute or act,
 - A description of each incident,
 - A description of any personal injury inflicted by the defendant,
 - A description of any property damage done by the defendant,
 - The name and address of each person having any knowledge of each such incident, dispute or act, and
 - How and in what manner each such incident, dispute or act ended.

23. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence against any stranger to the defendant having to do with the defendant's relationship to the plaintiff?
24. If your answer to the preceding interrogatory is in the affirmative, please state as to each incident, dispute or act:
- a. The name and address of each person involved or affected,
 - b. Each date and time,
 - c. Each location,
 - d. Each reason or explanation by the defendant for each such incident, dispute or act,
 - e. A description of each incident,
 - f. A description of any personal injury inflicted by the defendant,
 - g. A description of any property damage done by the defendant,
 - h. The name and address of each person having any knowledge of each such incident, dispute or act, and
 - i. How and in what manner each such incident, dispute or act ended.
25. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence having to do with the defendant's relationship to the plaintiff which resulted in the arrest of the defendant?
26. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of each such incident, dispute or act,
 - b. Each date, time and place,
 - c. The name and address of each person involved,
 - d. The name and address of each person having any knowledge of each such incident, dispute or act, and
 - e. The name and address of any police department involved.
27. Prior to the time of the alleged occurrence, had the defendant ever been involved in any incident, dispute or act of violence having to do with the defendant's relationship to the plaintiff which resulted in the court conviction of the defendant?
28. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of each such incident, dispute or act,
 - b. Each date, time and place,
 - c. The name and address of each person involved,
 - d. The name and address of each person having any knowledge of each such incident, dispute or act,
 - e. The name and address of any police department involved, and
 - f. The name and address of each court involved.
29. Please state the defendant's reputation in the defendant's community for fighting, violence and belligerency, stating:
- a. A description of the defendant's reputation,
 - b. The name and address of each person who has an opinion of the defendant's reputation,

- c. The substance of any statement made by the defendant on the subject matter of the defendant's reputation, and
- d. The substance of any statement taken by the defendant or someone on behalf of the defendant on the subject matter of the defendant's reputation.
30. As of the time of the alleged occurrence, had the defendant received any training or education in wrestling, boxing, karate or any other self-defense or fighting technique?
31. If your answer to the preceding interrogatory is in the affirmative, please state as to each technique:
- a. A description of each training or education,
- b. The name and address of each place of training or education,
- c. The inclusive dates of any training or education,
- d. Any award or honor received, and
- e. The stage of proficiency reached as to each technique.
32. As of the time of the alleged occurrence, had the defendant received any training or education in the armed forces in any combative technique?
33. If your answer to the preceding interrogatory is in the affirmative, please state as to each such technique:
- a. A description of each training or education,
- b. The name and address of each place of training or education,
- c. The inclusive dates of any training or education,
- d. Any award or honor received, and
- e. The stage of proficiency reached as to each technique.
34. As of the time of the alleged occurrence, did the defendant have possession of or the use of any firearm?
35. If your answer to the preceding interrogatory is in the affirmative, please state as to the defendant's possession or use of any firearm:
- a. A description of any firearm owned, giving make, model, caliber and serial number,
- b. A description of any firearm used, giving the name and address of the owner, the frequency of use and each reason for using each firearm,
- c. A description of each firearm license or permit owned by the defendant, and
- d. The nature and extent of any firearm training or education received by the defendant, indicating the dates, places and any award for proficiency.
36. As of the time of the alleged occurrence, please identify all athletics or sports engaged in by the defendant, stating:
- a. The identity of each sport,
- b. The frequency per year each sport had been played,
- c. The number of years each sport had been played,
- d. Each award received for each sport, and
- e. The defendant's proficiency in each sport.