

Failure To Support.

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 defendant's alleged failure to support the plaintiff.

For interrogatories available to ask for more detailed financial information about the defendant, see Chapter 3.

1. Please state the defendant's income from all sources at the time of the alleged occurrence, indicating:
 - a. The defendant's gross taxable income from all sources for the most recent calendar year,
 - b. The defendant's gross taxable income from the defendant's employment for the most recent calendar year,
 - c. The breakdown of the defendant's income from all sources, giving the gross income from each separate source for the most recent calendar year, and
 - d. Please identify the location and custodian of the defendant's financial records, giving the name and address of each custodian.
2. Please provide information about your current employment as a salaried employee, including the name and address of your employer and your annual gross salary (exclusive of all deductions).
3. Please indicate how often you are paid and your net salary per pay period.
4. Please provide information about your current employment as an hourly employee, including the name and address of your employer, your wage per hour, and overtime wage per hour.
5. Please provide information about your current compensation, identifying the number and types of deductions from your pay check, including a description of deductions for your retirement accounts, income tax deferral plans, your health insurance plan, your stock purchase deductions and any other deductions.
6. Please identify the current balances of each of your retirement accounts, income tax deferral plans, stock purchase plans, and any other deferral accounts.
7. Please identify the defendant's savings account or asset related to saving at the time of the alleged occurrence, stating:
 - a. A description of each account or asset,
 - b. The value of each saving account or asset,
 - c. The location, giving name and street address,
 - d. Whether there are other ownership interests, and, if so, give a description, including name and address,
 - e. If there are any outstanding liens or obligations, give details, and
 - f. Please state the name and location of the custodian of all records.

8. Please identify the defendant's real estate holdings or assets at the time of the alleged occurrence, stating:
 - a. A description of each holding or asset,
 - b. The fair market value of each asset,
 - c. The location, giving name and street address,
 - d. Whether there are other ownership interests, and, if so, give a description, including name and address,
 - e. If there are any outstanding liens or obligations, give details, and
 - f. Please state the name and location of the custodian of all records.
9. Please identify the defendant's other assets or things of value at the time of the alleged occurrence, stating:
 - a. A description of each asset or thing,
 - b. The value of each,
 - c. The location, giving name and street address,
 - d. Whether there are other ownership interests, and, if so, give a description, including name and address,
 - e. If there are any outstanding liens or obligations, give details, and
 - f. Please state the name and location of the custodian of all records.
10. Prior to the alleged occurrence, did the defendant provide any financial or other support to or for the benefit of the plaintiff?
11. If your answer to the preceding interrogatory is in the affirmative, please state as to all support provided by the defendant to the plaintiff:
 - a. The nature, extent and substance, including the dollar amount,
 - b. The duration, indicating the starting and ending dates,
 - c. Each type of support provided, including, but without limitation, food, clothing, shelter, education, transportation, social activities, and other,
 - d. Each reason or explanation for any termination of any part of such support,
 - e. The name and address of each person who was a witness to or has any knowledge of such support, and
 - f. The location and custodian of all records of such support.
12. Prior to the alleged occurrence, did the plaintiff make any request from the defendant for any financial or other support to or for the benefit of the plaintiff?
13. If your answer to the preceding interrogatory is in the affirmative, please state as to all support requested by the plaintiff to the defendant:
 - a. Each type of support requested, including, but without limitation, food, clothing, shelter, education, transportation, social activities, and other,
 - b. The nature, extent and substance, including the dollar amount of each request,
 - c. Each date of each request,
 - d. Each reason or explanation for each request,
 - e. The name and address of each person who was a witness to or has any knowledge of such request, and

- f. The location and custodian of any writing or record of each request for support.
14. Prior to the alleged occurrence, did the defendant ever deny any request for the defendant to provide for any financial or other support to the plaintiff?
15. If your answer to the preceding interrogatory is in the affirmative, please state as to any denial by the defendant of any request by the plaintiff for support, indicating:
- a. The date of each denial,
 - b. The reason or explanation for each denial,
 - c. The substance of each denial, indicating who said what to whom,
 - d. The name and address of each person who was a witness to or has any knowledge of such denial, and
 - e. The location and custodian of any writing or record of each such denial.
16. Is it the defendant's contention, allegation or belief that the defendant is currently providing adequate support for the plaintiff?
17. 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.
18. Is it the defendant's contention, allegation or belief that the defendant's inability to provide adequate support for the plaintiff was due to the defendant's lack of income and assets?
19. 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.
20. Is it the defendant's contention, allegation or belief that the defendant's inability to provide adequate support for the plaintiff was due to an inability to locate the plaintiff?
21. 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.
22. Is it the defendant's contention, allegation or belief that the plaintiff had an independent source of support?
23. 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 plaintiff's alleged source of support,
 - b. The source of the defendant's knowledge, and
 - c. The location and custody of records supporting the defendant's contention, allegation or belief.
24. Is it the defendant's contention, allegation or belief that there is no duty on the part of the defendant to provide support for the plaintiff because there is no valid legal marital relationship?
25. 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.
26. Is it the defendant's contention, allegation or belief that there is no duty on the part of the defendant to provide support for the plaintiff because of the existence of a prenuptial agreement?
27. 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 verbatim substance of any such prenuptial agreement,

- b. The identity, including name and address, of each person who witnessed or has knowledge of any such prenuptial agreement, and
 - c. The location and custodian of all writings or records relating to any prenuptial agreement.
28. Is it the defendant's contention, allegation or belief that the defendant has no duty to provide support to the plaintiff because the plaintiff has consented to receiving no support?
29. 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.

Defamation.

Definitions

The term "publication" as used in these interrogatories refers to the actual act of speaking, writing, printing, distributing, broadcasting, showing, or otherwise conveying the allegedly defamatory communication.

The term "occurrence" as used in these interrogatories refers to the facts alleging liability of the defendant as set forth in the plaintiff's complaint.

1. Please identify and describe the appearance of each and every person who observed or was present in the vicinity of the plaintiff's alleged occurrence, giving the name and address of each such person, if known.
2. Please describe fully each and every source of knowledge about the alleged occurrence of which you are aware, including:
 - a. The identification of each such source,
 - b. The date and time you received any information from each such source regarding the alleged occurrence,
 - c. The substance of all such information you received from each such source, and
 - d. The manner in which such information was received.
3. If you claim that any other person caused or contributed to cause the alleged occurrence, please state the name and address of each such person and the manner in which each such person caused or contributed to cause the alleged occurrence.
4. With regard to each agent or employee of the defendant that was involved in any way in the alleged communication or the publication thereof, please state:
 - a. The name, address and role or position of such employee or agent,
 - b. Whether the defendant agrees that such agent or employee was acting within the scope of his, her, or its authority or responsibility by such involvement, and
 - c. If the defendant does not so agree, the precise description of such agent or employee's scope of authority or responsibility, and of such agent or employee or employee's relationship with the defendant.
5. Prior to the publication of any allegedly defamatory communication or communications on which this action is based, had any similar communication or part thereof ever been communicated in any way by any person to any other person?

6. If the answer to the preceding interrogatory is in the affirmative, with respect to each such prior communication, please state:
 - a. The date, time, location, and forum or medium of such publication or communication,
 - b. The name, address, and role or function of each person, firm, corporation or association in any way involved or connected with such publication or communication,
 - c. The precise description or wording of such communication, and
 - d. The sources of all information used in such communication as known to you.
7. Does the defendant agree that at the time of the publication of any allegedly defamatory communication involved in the action, the plaintiff was more sensitive to the publication of such communication than an average person would be?
8. With respect to the preceding interrogatory, please state:
 - a. A full description of all sensitivities or lack thereof of the plaintiff which existed at the time of the alleged occurrence, and
 - b. Any and all facts which support or demonstrate the existence of such sensitivity or the lack thereof.
9. Was the defendant aware, prior to the alleged occurrence, that the plaintiff suffered from any illness, disability or other impairment of any kind?
10. If the answer to the preceding interrogatory is in the affirmative, please state:
 - a. The date and time of day that the defendant first became aware that the plaintiff suffered from any illness, disability or other impairment,
 - b. The manner in which the defendant became aware, and
 - c. The plaintiff's precise illness, disability or other impairment.
11. Please list all illnesses, disabilities and other impairments from which the plaintiff suffered at the time of the alleged occurrence.
12. Please describe fully all consumption of any alcohol or drugs by the defendant within 24 hours preceding the alleged occurrence.
13. Please describe in detail the alleged occurrence, indicating as to each alleged defamatory communication:
 - a. Its date, time, location, mode of publication, description, language, and wording,
 - b. The names, addresses, and roles or functions of all persons involved in any way,
 - c. Any facts extrinsic to such communication that, accompanied by such communication, would create or enhance any defamatory meaning or reference to the plaintiff,
 - d. The identities or descriptions of any groups or persons that do or might have knowledge of such extrinsic facts,
 - e. The identities or descriptions of any groups or persons that have or might have become aware of the alleged defamatory communications, indicating whether this awareness arises from the original publication or from its republication by anyone,

- f. Whether and in what manner you made, published, authorized, or participated in the making or publication of such communication,
- g. If your account of the publication of such communication differs in any way from that of the plaintiff, describe such differences and what significance they have relative to the allegations of defamation,
- h. If the communication is part of a larger work (printed, broadcasted, filmed, taped, written, photographed or spoken), identify that larger work and what relationship it has to the alleged defamatory communication,
- i. If publication was made by someone other than yourself, the identity and address of such other person, and the relationship such other person had with the defendant,
- j. The date, time, location, mode of publication, description, language, wording and person involved in any republication of such communication,
- k. Whether and why the defendant claims not to have been responsible for such communication, and
- l. If the defendant contends that an average or normal person becoming aware of the alleged communication would not believe that the plaintiff was the subject identified, described, or referred or alluded to, what facts or opinions support this contention.

14. As to each instance of publication of the alleged defamatory communication by means of broadcast, print, or other public medium, please indicate the geographic coverage of such publication and the approximate number of persons reached thereby.
15. With respect to each defamatory communication as alleged in the plaintiff's complaint, please state whether you intended:

- a. To make a statement by words or conduct, and, if so, set forth that statement verbatim,
- b. To communicate that statement to someone other than the plaintiff, and, if so, give all names or descriptions of any such person or persons,
- c. That such communication be understood to refer to the plaintiff,
- d. That such communication convey a defamatory meaning,
- e. That such communication be untruthful,
- f. That such communication damage the plaintiff's reputation, and
- g. To be malicious in any way.

16. With respect to each defamatory communication as alleged in the plaintiff's complaint:
- a. If the defendant contends that any part of such communication was truthful, please set forth such allegedly truthful part and state all reasons for the contention that it is true,
 - b. If the defendant is uncertain about the truth of any part of any such communication, please set forth each such part and state the reasons for this uncertainty about its truthfulness,
 - c. If the defendant contends that any part of any such communication was untrue, please set forth such untruthful part and state whether you or any agent or employee of the defendant knew that it was untrue when it was published, and
 - d. Please state all actual and possible sources for your information in such communication to the best of your knowledge and belief.

17. With respect to each defamatory communication alleged in the plaintiff's complaint, if you who were involved in the alleged defamation believed at the time such communication was made that it was truthful, please explain in detail:
 - a. The reasons for that belief, and
 - b. The date and manner in which you or such agent or employee learned that it was not true.
18. If you knew or believed when publication occurred that the alleged communication was or might be untrue, please explain why the defendant was involved in the publication of said communication.
19. Did you or anyone else benefit or expect to benefit in any way from the publication of any communication referred to in the plaintiff's complaint?
20. If the answer to the preceding interrogatory is in the affirmative, with respect to each such communication, please state:
 - a. The communication,
 - b. The name and address of each person benefitted or expected to benefit, and the relation of each such person to the defendant, and
 - c. The benefit received or expected, indicating whether it was received.
21. If you have communicated in any way with anyone regarding the allegations set forth in the plaintiff's complaint, with regard to each such oral or written communication, please state:
 - a. The name and address of each person involved in such communication,
 - b. The date and location where such communication took place,
 - c. The subject matter of such communication, and
 - d. The name and address of each person present at the time of such communication.
22. Subsequent to the publication of any allegedly defamatory communication or communications on which this action is based, has any similar communication or part thereof ever been communicated in any way by any person to any other person to the best of your knowledge and belief?
23. If the answer to the preceding interrogatory is in the affirmative, with respect to each such subsequent communication, please state:
 - a. The date, time, location, and forum or medium of such publication or communication,
 - b. The name, address, and role or function of each person, in any way involved or connected with such publication or communication,
 - c. The precise description or wording of such communication, and
 - d. The sources of all information used in such communication as known to you.
24. With respect to each defamatory communication alleged in the plaintiff's complaint, if you at any time retracted or modified such communication, please state:
 - a. The date, time, place, mode of communication, and wording of such retraction or modification,

- b. The names and addresses or other identification of those to whom such retraction or modification was given, and
- c. The time, date, place, mode of communication, and wording of any response made by the plaintiff to such retraction or modification.
25. With respect to each defamatory communication alleged in the plaintiff's complaint, if you ever offered to retract or modify such communication, please state:
- a. The date, time, place, mode of communication, and wording of each such offer,
- b. The names and addresses or other identification of those to whom such offer of a retraction or modification was given, and
- c. The date, time, place, mode of communication, and wording of any response made by plaintiff to such offer of retraction or modification, and the names and addresses of the person or persons to whom such response was communicated.
26. With respect to each defamatory communication alleged in the plaintiff's complaint, if the plaintiff at any time requested or demanded that you retract or modify such communication, please state:
- a. The date, time, place, mode of communication, and wording of each request or demand,
- b. The names and addresses or other identification of the person or persons to whom such request or demand was communicated, and
- c. The date, time, place, mode of communication, and wording of any response by you to such request or demand, and the names and addresses of person or persons to whom such response was communicated.
27. Please describe all defenses claimed by the defendant, including:
- a. The substance of such defense, and
- b. All facts which support each such defense.
28. If the defendant contends that publication of any communication as alleged in the plaintiff's complaint was not negligent, reckless or intentional, with respect to each such communication, please state the basis for this contention, describing in detail the defendant's exercise of due care with respect to all aspects of the publication of said communication.
29. Does the defendant contend that at the time of the occurrence the plaintiff had achieved public recognition or fame?
30. If the answer to the preceding interrogatory is in the affirmative, please describe in detail all facts upon which this contention is based, and indicate the nature, duration and reasons for such recognition or fame.
31. If the defendant contends that the plaintiff's actions, activities, statements, opinions, or likeness has been commented upon, printed, published or shown in any part of the media (e.g., television, radio, newspapers), please state with respect to each such instance within a period of two years prior to the alleged occurrence:
- a. The content of each such comment, publication or photograph,

- b. The name and address of each person, firm, corporation, or association that published, printed, showed, or commented upon such information, and
- c. The date, time, location, and medium of each such communication.
32. Does the defendant contend that the plaintiff consented or agreed to publication of any communication involved in this action?
33. If the answer to the preceding interrogatory is in the affirmative, as to each such agreement or consent, please state:
- a. The time, date, and place of each such agreement or consent,
- b. Whether each such agreement or consent was oral or written,
- c. If any agreement or consent was written, the name and address of each person having a copy of such writing,
- d. The name and address of each person with whom such consent or agreement was reached,
- e. The information or communication involved in each consent or agreement,
- f. The name and address of each person present when any such consent or agreement was reached,
- g. The content, nature, and extent of each such consent or agreement,
- h. Whether and how you, or any agent or employee of the defendant, exceeded or breached any part of any such consent or agreement, and
- i. Whether the plaintiff later revoked or modified any such consent or agreement in any way, giving the date and wording of any such revocation or modification.
34. With respect to each defamatory communication alleged in the plaintiff's complaint, if the defendant contends that such communication in any way involved judicial proceedings and/or the husband-wife relationship, please state in detail the facts upon which this contention is based.
35. If the defendant contends that any part of any communication involved in this action was not understood, was taken in jest, or was given some meaning other than the obvious one by anyone, please state:
- a. The relevant communication,
- b. The name and address or identifying characteristics of each person or group alleged to have misunderstood such communication or taken it in jest, and
- c. The detailed reasons for this contention.
36. With respect to each defamatory communication alleged in the plaintiff's complaint, if the defendant claims any complete or partial privilege or immunity as a defense to this action, please state in detail each such privilege or immunity and each reason why you believe that each such privilege or immunity applies.
37. With respect to each defamatory communication alleged in the plaintiff's complaint, if the defendant claims that such communication was made in a reasonable manner for a proper purpose, please describe in detail such reasonable manner and any proper purpose and state why this may entitle the defendant to a qualified privilege in this action.
38. Does the defendant contend that the plaintiff's reputation at the time of the alleged occurrence was already so discredited that the alleged defamatory communication did not significantly impugn the plaintiff's reputation?

39. If the answer to the preceding interrogatory is in the affirmative, please state:
- All facts, contentions and opinions supporting such an affirmative answer, and
 - Explain how such facts, contentions and opinions precluded significant damage to the plaintiff's reputation as a result of the alleged defamation.
40. If the defendant contends that, in being involved in the alleged defamatory communication or publication thereof, the defendant was repeating or relying upon what others had published about the plaintiff, please:
- Describe in detail each such prior publication, indicating the date and source thereof,
 - Explain why such prior publication was the basis for the alleged defamatory communication, and
 - Explain why the defendant or its agents or employees repeated or relied upon such prior publication.
41. If the defendant contends that, in being involved in the alleged defamatory communication, the defendant was responding to provocation by the plaintiff, please:
- Describe in detail the nature, substance and date of such provocation, and
 - Explain why such provocation was related to the defendant's involvement in the alleged defamatory communication.
42. If the defendant contends that the statute of limitations has run, please set forth all facts on which such claim is based, including the applicable statute.

Harassment.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean any harassment, including any telephone, communicating, following, watching, monitoring, engaging in surveillance or bothering of the plaintiff by the defendant.

- Please identify yourself, giving your full name, residence, business address, and occupation.
- Please identify and describe the appearance of each and every person who was present at the time of each such incident, including in your answer:
 - The name and address of each such person if known to you,
 - The date(s) on which each such person was present,
 - The location of each such person in reference to the plaintiff and the defendant during the time of each such incident,
 - The reason(s) for each such person being present at that time and place, and
 - The relationship, if any, which exists or existed between each such person and the defendant.

3. Please describe fully each and every source of knowledge about the alleged occurrence of which you are aware, including:
 - a. The identification of each such source,
 - b. The date and time you received any information from each such source regarding the alleged occurrence,
 - c. The substance of all such information you received from each such source, and
 - d. The manner in which such information was received.
4. If you claim that any other person caused or contributed to cause the alleged occurrence, please state the name and address of each such person and the manner in which each such person caused or contributed to cause the alleged occurrence.
5. Please describe in detail what relationship, if any, existed between the plaintiff and the defendant as of the time of the alleged occurrence, giving details as to:
 - a. The date and manner in which the relationship began,
 - b. The purpose of the relationship, and
 - c. The duration of the relationship.
6. Please attach a copy of all written records which pertain to the answers to the preceding interrogatory or indicate where and when such records may be examined by counsel.
7. Please describe in detail all actions of the defendant to enforce or fulfill the obligations of such relationship between the plaintiff and the defendant.
8. Please describe in detail all relationships, if any, which existed between the plaintiff and the defendant within five years prior to the time of the first alleged incident, giving details as to:
 - a. The date and manner in which the relationship(s) began,
 - b. The purpose of the relationship(s),
 - c. The duration of the relationship(s), and
 - d. The manner in which the relationship(s) was ended.
9. Please attached a copy of all written records which pertain to the answers to the preceding interrogatory or indicate where and when such records may be examined by counsel.
10. Please describe in detail all actions of the defendant or any agent or employee of the defendant to enforce or fulfill the obligations of each such relationship.
11. Please describe everything which the defendant did in an attempt to avoid any injury or damage just prior to or at the time of each such alleged incident.
12. Please describe how well the defendant knew the plaintiff, indicating the source of such knowledge and including in your answer a description of the plaintiff's reputation in the community if known to you.
13. Please state, whether prior to any alleged incident, the defendant knew of or was aware of any sensitivity or susceptibility of the plaintiff.
14. If the answer to the preceding interrogatory is in the affirmative, please give a full and complete description of:
 - a. The substance of such knowledge,
 - b. The date and manner in which such knowledge was gained,

- c. The source of such knowledge, and
 - d. What actions, if any, the defendant took in response to it.
15. Please describe in full detail how the alleged occurrence took place, giving all events in detail in the order in which they occurred, before, at the time of, or after the occurrence, which had any bearing on the cause and manner of the happening of the occurrence.
16. Please state in complete detail as to each alleged incident:
 - a. The date and time of each incident,
 - b. The place of each incident,
 - c. The physical description of the place where each incident occurred,
 - d. All reasons known to you for which the plaintiff was present in each such place,
 - e. All the reasons for which the defendant was present in each such place, and
 - f. The physical appearance of the defendant during each such incident.
17. Please state fully and in complete detail the exact place(s) where each incident of the alleged occurrence took place, in chronological order, including in your answer:
 - a. The address of each such place,
 - b. The name and address of the owner of each such place,
 - c. The name and address of the person, firm or corporation in control of each place,
 - d. The relationship, if any, between the defendant and the person, firm or corporation named in (b) and (c), and
 - e. The nature of the use of the place or area where each such incident occurred.
18. Please describe fully all the actions of the defendant during each alleged incident.
19. Please describe fully as to each alleged incident:
 - a. All physical contact between the plaintiff and the defendant,
 - b. The words of the defendant,
 - c. The gestures of the defendant,
 - d. The tone of voice of the defendant, and
 - e. Whether the encounter with the plaintiff was planned or otherwise.
20. If the exact words cannot be remembered, please give the substance of each conversation or communication with the plaintiff during each alleged incident, indicating whether the defendant swore, threatened violence, made accusations of dishonesty or illegal or immoral behavior, threatened legal proceedings, threatened to reveal information to the plaintiff's employer or neighbors, or spoke in any other abusive or insulting manner.
21. Please describe fully as to each alleged incident, the conduct, conversation and actions of the plaintiff.
22. Within three years prior to or at the time of the alleged occurrence, did the defendant make any telephone call to the plaintiff?
23. If your answer to the preceding interrogatory is in the affirmative, please state as to any telephone call:
 - a. Each date and time,
 - b. The frequency per week,
 - c. The place called,

- d. How the defendant obtained the plaintiff's telephone number,
 - e. The purpose, reason or explanation of each call,
 - f. The substance and content of each call, indicating who said what to whom,
 - g. The name and address of each witness and each person having any knowledge of each such call, and
 - h. The name and address of the location and any custodian of any writing or record as to each such call.
24. Within three years prior to or at the time of the alleged occurrence, did the defendant communicate with the plaintiff other than by telephone?
25. If your answer to the preceding interrogatory is in the affirmative, please state as to other means of communication:
- a. Each date and time,
 - b. Each method or manner of communication,
 - c. Each location used by the defendant,
 - d. The frequency per week,
 - e. The purpose, reason or explanation for each such communication,
 - f. The substance and content of each such communication,
 - g. The duration of each such communication,
 - h. The name and address of each witness and each person having any knowledge of each such communication, and
 - i. The name and address of the location and any custodian of any writing or record as to each such communication.
26. Within a year prior to or at the time of the alleged occurrence, was the defendant present in the same location as the plaintiff?
27. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. Each date and time,
 - b. Each location,
 - c. The frequency of the defendant being present at the same location as the plaintiff,
 - d. The defendant's purpose, reason or explanation for the defendant's presence,
 - e. The defendant's duration at each location,
 - f. The name and address of each witness and each person having any knowledge of each such communication, and
 - g. The name and address of the location and any custodian of any writing or record regarding the defendant's presence at the same location as the plaintiff.
28. Within a year prior to or at the time of the alleged occurrence, was the defendant involved in any act or conduct consisting of following, monitoring, watching, engaging in surveillance or harassing the plaintiff?
29. If your answer to any part of the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
- a. Each date and time,
 - b. Reason, purpose or explanation for each act or conduct,
 - c. A description of each act or conduct, and
 - d. The result of each act or conduct.

30. Within a year prior to or at the time of the alleged occurrence, did the defendant ask or request any third person to communicate with the plaintiff?
31. If your answer to the preceding interrogatory is in the affirmative, please state as to any such request to a third person:
- Name and address,
 - Occupation,
 - Relation to the defendant,
 - The date and time of each request,
 - The reason, purpose or explanation of each such request, and
 - The substance and content of each such request.
32. Within a year prior to or at the time of the alleged occurrence, did any third person communicate with the plaintiff at the defendant's request or on behalf of the defendant?
33. If your answer to the preceding interrogatory is in the affirmative, please state as to any communication made by any third person to the plaintiff at the request of the defendant:
- Name and address,
 - Occupation,
 - Relation to the defendant,
 - The date and time of each communication,
 - The reason, purpose or explanation of each such communication,
 - The substance and content of each such communication, and
 - The result of each such communication.
34. Within a year prior to or at the time of the alleged occurrence, did the defendant ask or request any third person to be involved in any act or conduct consisting of following, monitoring, watching, engaging in surveillance or harassing the plaintiff?
35. If your answer to the preceding interrogatory is in the affirmative, please state as to any such request to a third person:
- Name and address,
 - Occupation,
 - Relation to the defendant,
 - The date and time of each request,
 - The reason, purpose or explanation of each such request, and
 - The substance and content of each such request.
36. Within a year prior to or at the time of the alleged occurrence, did any third person, at the request of the defendant, engage in any act or conduct consisting of following, monitoring, watching, engaging in surveillance or harassing the plaintiff?
37. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct by any third person:
- Name and address of each third person,
 - Occupation of each third person,
 - Relation to the defendant of each third person,
 - Date and time of each such act or conduct,
 - Reason, purpose or explanation of each such act or conduct,

- f. The substance and content of each such act or conduct,
 - g. A description of each such act or conduct, and
 - h. The result of each such act or conduct.
38. At or about the time of the alleged occurrence, did the plaintiff ask, request or demand that the defendant terminate each act or conduct consisting of following, monitoring, watching, engaging in surveillance, harassing, contacting or communicating with the plaintiff?
39. If your answer to the preceding interrogatory is in the affirmative, please state as to each such request or demand by the plaintiff to the defendant:
- a. Each date and time,
 - b. The nature, content and substance of each request or demand,
 - c. The defendant's response to each such request or demand,
 - d. The name and address of each person who was a witness to or has any knowledge of any plaintiff's request or demand, and
 - e. The name and address of the location and the custodian of any writing or record of each such request or demand.
40. Did the defendant, prior to the time of any of the alleged incidents or after the time of the first alleged incident, receive or become aware of any complaint in reference to any contact or communication between the plaintiff and the defendant?
41. If the answer to the preceding interrogatory is in the affirmative, please describe:
- a. The date on which the complaint was received,
 - b. The substance of the complaint,
 - c. The identity of the person who made the complaint,
 - d. The manner in which the complaint was received, and
 - e. All actions taken in response to such complaint.
42. Please give the substance of any and all conversations, communications or statement made by or between the plaintiff and the defendant relative to the alleged occurrence.
43. Did the defendant ever take or receive any statement, either oral or in writing, from any person, including parties, who had any information or knowledge relating to the alleged occurrence?
44. If the answer to the preceding interrogatory is in the affirmative, please state:
- a. The identification, including name and address, of each such person,
 - b. The date of each such statement,
 - c. The substance, as best you can give it, of each such statement, and
 - d. If such statement was in writing, either attach a copy hereto, or indicate where and when such statement maybe examined by counsel.
45. Please describe in detail as to each alleged incident the plaintiff's emotional or mental condition when the defendant had initial contact with the plaintiff, during the incident, and when the incident ended.
46. Did the plaintiff seem distressed, upset, nervous, shocked, frightened, fearful, humiliated, insulted, angered, or outraged at any time during each alleged incident?
47. If the answer to the preceding interrogatory is in the affirmative, please describe:

- a. The exact nature of the plaintiff's mental or emotional state, including the physical manifestations,
 - b. The time and manner in which the defendant realized that the plaintiff was becoming so affected,
 - c. All actions taken by the defendant upon gaining such knowledge, and
 - d. Whether the encounter or contact ended because of this reaction by the plaintiff.
48. Please describe all defenses claimed by the defendant, including:
- a. The substance of each such defense, and
 - b. All facts which support each such defense.
49. Please describe any act or statement by the plaintiff which the defendant contends authorized or incited the alleged incident.
50. If the defendant received notice of any kind from the plaintiff or someone on behalf of the plaintiff of the happening of the alleged occurrence, please give the date of receipt, the method by which notice was given and the substance of such notice.
51. Is it the contention or allegation of the defendant that the plaintiff by any act or omission caused or contributed to cause the alleged occurrence?
52. If the answer to the preceding interrogatory is in the affirmative, please state in detail each act or omission by the plaintiff which it is contended or alleged caused or contributed to cause the alleged occurrence.
53. Please state in complete detail the facts which form the basis for whatever legal relationship the defendant claims existed between the plaintiff and the defendant at the time of the alleged occurrence.
54. Is it the defendant's contention, allegation or belief that the plaintiff consented to each act or conduct allegedly consisting of following, monitoring, watching, engaging in surveillance, harassing, contacting or communicating with the plaintiff?
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 as to any such consent:
- a. The date and time of each such consent,
 - b. The substance and content of each such consent,
 - c. The name and address of each person who witnessed or has any knowledge of each such consent, and
 - d. The name and address of each location and each custodian of any writing or record relating to each such consent.
56. Is it the defendant's contention, allegation or belief that any act or conduct by or on behalf of the defendant against the plaintiff was not repeated, persistent or offensive to a person of ordinary sensibilities?
57. If you answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief.
58. Is it the defendant's contention, allegation or belief that there was a lack of intent by the defendant to engage in any act or conduct against the plaintiff?
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.

60. Is it the defendant's contention, allegation or belief that the defendant had a privilege to engage in any act or conduct involved in the plaintiff's allegations contained in the complaint?
61. 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.