

IN THE \_\_\_\_\_

**JANE DOE** :  
 :  
**Plaintiff** : **CASE NO.:**  
 :  
**v.** :  
 :  
**WASHINGTON METROPOLITAN** :  
**AREA TRANSIT AUTHORITY** :  
 :  
**Defendant** :

**PLAINTIFF’S FIRST SET OF INTERROGATORIES TO DEFENDANT WASHINGTON METRAPOLITAN AREA TRANSIT AUTHORITY**

COMES NOW, the Plaintiff, Jane Doe, by and through counsel, and files with the Clerk the following First Set of Interrogatories to be answered by the Defendant, Washington Metropolitan Area Transit Authority within thirty days (30) days after service pursuant to MD Rules, Rule 2-421.

**Definitions and Instructions**

- A. In accordance with Rule 2-421(b), your response shall set forth the interrogatory, and shall set forth the answer to the interrogatory “separately and fully in writing under oath” or “shall state fully the grounds for refusal to answer any interrogatory.” This response shall be signed by you.
  
- B. In accordance with Rule 2-421(b), your answers “shall include all information available” to you “directly or through agents, representatives, or attorneys.”

- C. Pursuant to Rule 2-401(e), these interrogatories are continuing in nature so as to require you to file supplementary answers if you obtain further information before trial.
- D. Pursuant to Rule 2-421(c), if you elect to specify and produce business records of yours in answer to any interrogatory, your specification shall be in sufficient detail to enable the interrogating party to locate and identify the records from which the answer may be ascertained.
- E. Where the name or identity of a person is requested, please state his or her full name, phone number, home address, business address, if known.
- F. Unless otherwise indicated, these interrogatories refer to the time, place, and circumstances of the occurrence mentioned or complained of in the pleading.
- G. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agent, representatives, and unless privileged, his attorney(s). When answer is made by a corporate Defendant, state the name, address, and title of the person supplying the information and making Affidavit and the sources of his information.
- H. The pronouns "you" and "your" refer to the party to whom these Interrogatories and Requests for Production of Documents are addressed and the persons mentioned in Clause D.
- I. "Documents" and "things" mean any written, recorded, or graphic matter, however produced or reproduced, and whether or not claimed to be privileged against discovery on

any ground, including, but not limited to, reports, records, lists, memoranda, telegrams, correspondence, "E-mail", schedules, photographs, videotapes, sound records, microfilm, microfiche, films, and information stored in computers or other data or word processing equipment at any other tangible objects.

- J. If any document or thing is omitted or not produced because of a claim of privilege, identify the date, author, and addressee of the document and the basis of the claimed privilege.

### **Interrogatories**

1. Provide your agent(s), servant(s) and/or employee(s) full name, address, social security number, date of birth, and other names or aliases he/she has ever used or been known by, who operated access metro bus on July 15, 2015, and in which the Plaintiff was a passenger.

**ANSWER:**

2. Describe your agent(s), servant(s) and/or employee(s), who was operating Metro Bus, duties and hours worked for the time period of week June 13, 2015.

**ANSWER:**

3. Detail all jurisdictions that your agent, servant and/or employee is or has ever been licensed to drive in, and all jurisdictions she/he has been licensed to operate metro access bus in. Provide the driver's license number, date of licensure, and describe the current status of each such license and whether any negative action including revocation, suspension, withdrawal, or any other restriction) has ever been taken on any such license.

**ANSWER:**

4. If your agent, servant and/or employee, the operator of the said Metro Bus, consumed an alcoholic beverage, drugs (prescriptive or otherwise), and/or medication within 24 hour period immediately before the accident, or if you were required to take any medication within twelve hour period immediately before the collision, state the nature thereof, the purpose thereof, the name and address of the doctor who prescribed the medication, if any, and dosage prescribed, the amount taken or that was to be taken within such period. As to alcohol, the amount consumed, when and where consumed, and identify all person present during such consumption.

**ANSWER:**

5. State whether at any time during the fifteen year period preceding the date of your answers to these interrogatories, your agent, servant and/or employee has been convicted of any crime including traffic offenses. If so, for each conviction identify the court in which he/she was convicted and state the amount of any fine and the date and length of any incarceration imposed. For purposes of this interrogatory, a conviction includes a plea of *nolo contendere* followed by a sentence, whether or not the sentence is suspended.

**ANSWER:**

6. State whether there exists any protocols, procedures, guidelines, standards, or policy manual(s) to govern or guide your agents, servants and/or employees, such as drivers of Metro Bus, in the exercise of their duties on July 15, 2015.

**ANSWER:**

7. If the above Interrogatory is answered in the affirmative, state whether your agents, servants, and/or employees followed these protocols, procedures, guidelines,

standards, or policy manual(s) in the exercise of their duties on or about July 15, 2015.

**ANSWER:**

8. Identify each manager, supervisor, operators, driver, dispatcher, receptionist, secretary and other employee, agent, and/or servant who was on duty within the 48 hour period prior to and after the accident who had any interaction or supervisory responsibilities with the Metro Bus driver who transported the Plaintiff, indicating the nature of your relationship (i.e. agent, servant, and/or employee) with each such person, job position and duties at the time of the occurrence and at present.

**ANSWER:**

9. Describe all written and verbal statements given by you, your employees, agents, servants, representatives or witnesses regarding the accident involving the Plaintiff.

**ANSWER:**

10. Give a complete statement of the facts as to how you contend that the occurrence took place including the exact location of the occurrence, the direction in which all operators were proceeding, and the speed at which all operators were proceeding.

**ANSWER:**

11. Identify all written communication, including internal minutes of all meetings and notes therefrom, subsequent to the accident and/or the driver of the Metro Bus who transported the Plaintiff, regarding safety procedures and vehicle operations at WMATA.

**ANSWER:**

12. If a report about this occurrence was made by you or your agent servant or employee in the ordinary course of business, including, but not limited to, an accident report or quality assurance report, provide the date of each report and identify the person(s) who made each report and the person(s) who presently have custody of each report.

**ANSWER:**

13. Identify each person who has given you or your agents, servants and/or employees a signed, written, taped recorded or oral statements concerning the circumstances of this case, including the names, addresses and telephone numbers of each such person.

**ANSWER:**

14. Identify the Metro Bus vehicle, along with vehicle identification number (VIN), in which the Plaintiff was a passenger on July 15, 2015.

**ANSWER:**

15. If it is your contention that Plaintiff's injuries on July 15, 2015 were caused in whole or in part by some person or persons other than your agents, servants and/or employees, please identify each such person and act or omission.

**ANSWER:**



16. Identify every person and their last known address not otherwise identified in your Answers to these Interrogatories, including eyewitnesses to all or part of the occurrence, who has personal knowledge of any facts material to this case and generally describe or summarize these facts each person possesses which are material to this claim.

**ANSWER:**

17. State the substance of all discussions concerning the occurrence that you or your agents, servants and/or employees or others in your presence had with any party to this case. State when and where each discussion took place and identify all persons who were present.

**ANSWER:**

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Attorney's Name, Bar#  
Attorney for Plaintiff/Defendant  
Address  
Phone

