

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

Petitioner/Plaintiff,

Vs. NO. _____

Respondent/Defendant

FIRST SUPPLEMENTAL RESPONSE TO PLAINTIFFS' DISCOVERY REQUESTS

COMES NOW the Defendant, _____, ("_____"), through counsel, and supplements its answers to discovery as follows:

INTERROGATORY NO. 6: Identify all reports or investigations undertaken by _____, its employees, agents or insurers in the claims in this case.

ANSWER: No written reports or investigations responsive to this interrogatory were made prior to suit being filed. The Defendant objects to producing any reports or investigations produced after suit being filed, since such information is clearly protected from discovery as being trial preparation materials, mental impressions and/or opinions of a lawyer.

INTERROGATORY NO. 11: State the content of all advertisements of _____, including but not limited to radio, television and newspaper advertisements.

ANSWER: The Defendant objects that this interrogatory seeks production of documents which are not relevant to the issues in this action, and which are not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, _____ only has

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