COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

 DOCKET NO. «docket»

«plaintiff», )

 Plaintiff )

 )

VS. )

 )

«defendant», )

 Defendant )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

**NOTICE OF APPEARANCE**

 Kindly notice the appearance of «attorney» on behalf of the defendant, «defendant», in the above captioned matter.

 Respectfully submitted,

 The Defendant,

 «defendant»,

 By its attorney,

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 «attorney», BBO #«bbo»

 Suffolk University Law School

 120 Tremont Street, 6th Floor

 Boston, Massachusetts 02108

 (123) 456-7890

 sulslaw@email.com

Date: December 19, 2017

COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

 DOCKET NO. «docket»

«plaintiff» )

 Plaintiff, )

 )

VS. )

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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

**DEFENDANT, «defendant»’S,**

**FIRST SET OF INTERROGATORIES PROPOUNDED TO THE PLAINTIFF, «plaintiff»**

 Pursuant to Rule 33 of Massachusetts Rules of Civil Procedure, the Defendant, «defendant», demands that the Plaintiff, «plaintiff», answer fully, separately and under oath, the following Interrogatories within forty-five (45) days of receipt thereof.

**PRELIMINARY STATEMENT**

 In answering these, the Plaintiff is required to set out each responsive fact, circumstance, act or course of conduct known to the Plaintiff, his agents, attorneys or other persons acting on his behalf or under his control, or about which any of the possess information.

**DEFINITIONS**

For purposes of these Interrogatories the uniform definitions set forth in Superior Court Standing Order 1-09 shall apply, and in addition, the following definitions shall apply, unless otherwise specified:

1. “You”, “your”, and “Plaintiff” shall refer to the named plaintiff,«plaintiff»;
2. “Defendant” will refer to the named defendant, «defendant», their agents, servants, employees, and trustees.

**INTERROGATORIES**

INTERROGATORY NO. 1

INTERROGATORY NO. 2

INTERROGATORY NO. 3

INTERROGATORY NO. 4

INTERROGATORY NO. 5

INTERROGATORY NO. 6

INTERROGATORY NO. 7

INTERROGATORY NO. 8

INTERROGATORY NO. 9

INTERROGATORY NO. 10

INTERROGATORY NO. 11

INTERROGATORY NO. 12

INTERROGATORY NO. 13

INTERROGATORY NO. 14

INTERROGATORY NO. 15

INTERROGATORY NO. 16

INTERROGATORY NO. 17

INTERROGATORY NO. 18

INTERROGATORY NO. 19

INTERROGATORY NO. 20

INTERROGATORY NO. 21

INTERROGATORY NO. 22

INTERROGATORY NO. 23

INTERROGATORY NO. 24

INTERROGATORY NO. 25

INTERROGATORY NO. 26

INTERROGATORY NO. 27

 Respectfully submitted,

 The Defendant,

 «defendant»

 By its attorney,

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 «attorney», BBO #«bbo»

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COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

 DOCKET NO. «docket»

«plaintiff» , )

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 )

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 )

«defendant» , )

 Defendant. )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

**DEFENDANT,«defendant»’S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS FOR THE PLAINTIFF, «plaintiff»**

 The Defendant, «defendant» pursuant to Rule 34 of the Massachusetts Rules of Civil Procedure, requests that the plaintiff, «plaintiff», produce and permit the defendant to inspect, copy and photograph all non-privileged documents and things in the plaintiff’s possession, custody or control, which embody, refer to or relate to the following subjects.

**DEFINITIONS**

For purposes of these Requests the uniform definitions set forth in Superior Court Standing Order 1-09 shall apply, and in addition, the following definitions shall apply, unless otherwise specified:

1. “You”, “your”, and “Plaintiff” shall refer to the named Plaintiff, «plaintiff».
2. “Defendant” will refer to the named Defendant, «defendant», their agents, servants, employees, and trustees.

**REQUESTS**

REQUEST NO. 1

REQUEST NO. 2

REQUEST NO. 3

REQUEST NO. 4

REQUEST NO. 5

REQUEST NO. 6

REQUEST NO. 7

REQUEST NO. 8

REQUEST NO. 9

REQUEST NO. 10

REQUEST NO. 11

REQUEST NO. 12

REQUEST NO. 13

REQUEST NO. 14

REQUEST NO. 15

REQUEST NO. 16

REQUEST NO. 17

REQUEST NO. 18

REQUEST NO. 19

REQUEST NO. 20

REQUEST NO. 21

REQUEST NO. 22

 Respectfully submitted,

 The Defendant,

 «defendant»

 By its attorney,

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 «attorney», BBO #«bbo»

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