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 plaintiff, «plaintiff», in the above captioned matter.

 Respectfully submitted,

 The Plaintiff,

 «plaintiff»,

 By its attorney,

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 «attorney», BBO #«bbo»

 Suffolk University Law School

 120 Tremont Street, 6th Floor

 Boston, Massachusetts 02108

 (123) 456-7890

 sulslaw@email.com

Date: December 20, 2017

COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

 DOCKET NO. «docket»

«plaintiff» , )

 Plaintiff, )

 )

VS. )

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**PLAINTIFF, «plaintiff»‘S**

**FIRST SET OF INTERROGATORIES PROPOUNDED TO THE DEFENDANT, «defendant»**

 Pursuant to Rule 33 of Massachusetts Rules of Civil Procedure, the Plaintiff, «plaintiff», demands that the Defendant, «defendant»’s 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 Defendant, 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 “Defendant” shall refer to the named Defendant, «defendant»;
2. “Plaintiff” will refer to the named Plaintiff, «plaintiff», 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 Plaintiff,

 «plaintiff»,

 By its attorney,

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 «attorney», BBO #«bbo»

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

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

 The Plaintiff, «plaintiff», pursuant to Rule 34 of the Massachusetts Rules of Civil Procedure, requests that the Defendant, «defendant», produce and permit the plaintiff to inspect, copy and photograph all non-privileged documents and things in the defendant’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 “Defendant” shall refer to the named Defendant, «defendant»;
2. “Plaintiff” will refer to the named Plaintiff, «plaintiff», 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 Plaintiff,

 «plaintiff»

 By its attorneys,

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 «attorney», BBO #«bbo»

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