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 4
    "CLIENT NAME"
 5
 6
 7
                 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 8
       COUNTY OF "COUNTY NAME" - "COURTHOUSE NAME OR DISTRICT"
 9
10
    "FIRST PLAINTIFF'S NAME", et al.,
                                             Case No. "CASE NO."
11
                                             Assigned for all purposes to:
                                                    Hon. "Judge's full name"
               Plaintiffs,
                                             Judge:
12
                                             Dept.:
                                                    "DEPARTMENT NO."
         v.
13
    "FIRST DEFENDANT'S NAME", et al.,
                                             SPECIAL INTERROGATORIES, SET
14
                                             "ONE, TWO, THREE?"
               Defendants.
15
16
                                  'CLIENT NAME''
   PROUNDING PARTY:
17
                                  'RESPONDING PARTY'S NAME''
   RESPONDING PARTY:
18
   SET NO.:
                                  'ONE, TWO, THREE?"
19
20
21
         "PROPOUNDING PARTY NAME" ("Propounding Party") hereby requests that
    'RESPONDING PARTY'S NAME", ("Responding Party"), answer under oath pursuant
22
   to Sections 2030.210 to 2030.300 of the Code of Civil Procedure the following Special
23
   Interrogatories within thirty (30) days of service thereof.
24
25
   11
26 \
27
   11
28
   11
                    SPECIAL INTERROGATORIES, SET "ONE? TWO?"
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PRELIMINARY NOTICE

Each a	nswer must	t be as complete and	d straightforward	as the informat	ion reasonably
available to yo	ou permits.	If an interrogatory	cannot be answe	ered completely,	, answer it to
the extent pos	sible.				

If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.

Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.

Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information. In response to any interrogatory in which you are asked to identify, or which otherwise requests the identify of, any document (as defined below) the identification set forth in your response must be sufficient to satisfy the requirements for a Request to Produce under Section 2031 of the California *Code of Civil Procedure*; a copy of the specified document may be attached to your responses to the interrogatories in lieu of its identification.

SPECIAL INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

If YOU contend that "PASTE THE CONTENTION HERE", please state all facts that support YOUR contention. [For the purposes of these interrogatories, "YOU", "YOUR" and "YOURS" shall refer to the Responding Party, "RESPONDING PARTY'S FULL NAME", including any of his/her/its employees,

officers, agents or representatives.]

If YOU contend that "PASTE CONTENTION HERE", please IDENTIFY all PERSONS who have information to support that contention. [As used herein the term "IDENTIFY" with respect to a person shall mean to provide the name, last known address and telephone number of each PERSON. As used herein the term "PERSON" or "PERSONS" is defined as set forth in section 175 of the Evidence Code and shall mean, without limitation, any individual, corporation, partnership, limited partnership or legal entity, and includes the present and former officers, executives, partners, brokers, and all other PERSONS acting or purporting to act on behalf of them, and any of their present or former parent corporations, subsidiaries, affiliates, divisions, predecessors and successors in interest, unless the context otherwise indicates.]

SPECIAL INTERROGATORY NO. 3:

If YOU contend that "PASTE CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention. [As used herein, the term "IDENTIFY" with respect to a DOCUMENT shall mean to state the title of the DOCUMENT, the date(s) the DOCUMENT was created, sent and/or received, the name(s), title(s) and the occupation(s) of the individuals who prepared, produced, reproduced or were recipients of the DOCUMENT and the nature of the DOCUMENT (e.g. a letter, contract, or agreement, etc.). As used herein, "DOCUMENT(S)" shall mean and refer to all originals, copies, duplicates, and drafts, or other production of written, graphic, or otherwise recorded matter, however produced or reproduced, whether inscribed by hand, or by mechanical, electronic, microfilm or photographic means, or by any other means, including, but not limited to, all electronically stored information as defined in Code of Civil Procedure section 2031.010, writings, originals and duplicates as defined in Evidence Code, sections 250, 255, and 260 and also including abstracts; address books; agreements; analysis of any kind; appointment books; balance sheets; bids; billings; books of account; brochures;

1	calendars, personal logs and day-timers; checks and check receipts; circulars;
2	compilations; computer cards, programs, diskettes, runs, and printouts; consultants' reports
3	or studies; contracts; correspondence; diagrams; diaries; directories; disks; estimates;
4	expense account records, sheets, and reports; financial statements whether audited or
5	unaudited; insurance policies; ledgers of accounts; legal documents; letters; licenses; lists;
6	logbooks; manuals; maps; memoranda of any kind; minutes or records of any kind;
7	movies; newspapers or periodicals, or any excerpts therefrom; notes; notebooks; opinions;
8	pamphlets; permits; photographs; plans, specifications; statements; statistical analyses;
9	studies of any kind; summaries; tabulations; tallies; telegraphs; videotapes; voice or sound
10	recordings; vouchers; and working drawings, papers and files.]
11	
12	SPECIAL INTERROGATORY NO. 4:
13	If YOU contend that "INSERT 2nd CONTENTION HERE", please state all facts
14	that support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 5:
17	If YOU contend that "INSERT 2nd CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 6:
21	If YOU contend that "INSERT 2nd CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 7:
25	If YOU contend that "INSERT 3rd CONTENTION HERE", please state all facts
26	that support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 8:
	4
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT 3rd CONTENTION HERE", please IDENTIFY all
2	PERSONS who have information to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 9:
5	If YOU contend that "INSERT 3rd CONTENTION HERE", please IDENTIFY all
6	DOCUMENTS to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 10:
9	If YOU contend that "INSERT 4th CONTENTION HERE", please state all facts
10	that support YOUR contention.
11	
12	SPECIAL INTERROGATORY NO. 11:
13	If YOU contend that "INSERT 4th CONTENTION HERE" , please IDENTIFY all
14	PERSONS who have information to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 12:
17	If YOU contend that "INSERT 4th CONTENTION HERE", please IDENTIFY all
18	DOCUMENTS to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 13:
21	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
22	support YOUR contention.
23	
24	SPECIAL INTERROGATORY NO. 14:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	PERSONS who have information to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 15:
	5
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	DOCUMENTS to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 16:
5	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
6	support YOUR contention.
7	
8	SPECIAL INTERROGATORY NO. 17:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	PERSONS who have information to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 18:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	DOCUMENTS to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 19:
17	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
18	support YOUR contention.
19	
20	SPECIAL INTERROGATORY NO. 20:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	PERSONS who have information to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 21:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	DOCUMENTS to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 22:
	6
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	
4	SPECIAL INTERROGATORY NO. 23:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 24:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 25:
13	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
14	support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 26:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 27:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 28:
25	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
26	support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 29:
	7

SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
1	•
2	PERSONS who have information to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 30:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	DOCUMENTS to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 31:
9	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
10	support YOUR contention.
11	
12	SPECIAL INTERROGATORY NO. 32:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	PERSONS who have information to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 33:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	DOCUMENTS to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 34:
21	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
22	support YOUR contention.
23	
24	SPECIAL INTERROGATORY NO. 35:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	PERSONS who have information to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 36:
	8 SPECIAL INTERROGATORIES, SET "ONE? TWO?"
l	ı

If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY DOCUMENTS to support that contention. SPECIAL INTERROGATORY NO. 37: If YOU contend that "INSERT CONTENTION HERE", please state all factors of the support YOUR contention.	
3 4 SPECIAL INTERROGATORY NO. 37: 5 If YOU contend that "INSERT CONTENTION HERE", please state all fa	cts that
4 SPECIAL INTERROGATORY NO. 37: 5 If YOU contend that "INSERT CONTENTION HERE", please state all fa	cts that
If YOU contend that "INSERT CONTENTION HERE", please state all fa	cts that
	cts that
6 support YOUR contention.	
7	
8 SPECIAL INTERROGATORY NO. 38:	
9 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY	Y all
PERSONS who have information to support that contention.	
11	
12 SPECIAL INTERROGATORY NO. 39:	
If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY	Y all
14 DOCUMENTS to support that contention.	
15	
16 SPECIAL INTERROGATORY NO. 40:	
17 If YOU contend that "INSERT CONTENTION HERE", please state all fa	cts that
18 support YOUR contention.	
19	
20 SPECIAL INTERROGATORY NO. 41:	
21 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY	Y all
PERSONS who have information to support that contention.	
23	
24 SPECIAL INTERROGATORY NO. 42:	
25 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY	Y all
26 DOCUMENTS to support that contention.	
27	
28 SPECIAL INTERROGATORY NO. 43:	
9	
SPECIAL INTERROGATORIES, SET "ONE? TWO?"	

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	support 1 ook contention.
4	SPECIAL INTERROGATORY NO. 44:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 45:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 46:
13	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
14	support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 47:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 48:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 49:
25	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
26	support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 50:
	10
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	PERSONS who have information to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 51:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	DOCUMENTS to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 52:
9	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
10	support YOUR contention.
11	
12	SPECIAL INTERROGATORY NO. 53:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	PERSONS who have information to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 54:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	DOCUMENTS to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 55:
21	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
22	support YOUR contention.
23	
24	SPECIAL INTERROGATORY NO. 56:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	PERSONS who have information to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 57:
	11
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	DOCUMENTS to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 58:
5	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
6	support YOUR contention.
7	
8	SPECIAL INTERROGATORY NO. 59:
9	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
10	PERSONS who have information to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 60:
13	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
14	DOCUMENTS to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 61:
17	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
18	support YOUR contention.
19	
20	SPECIAL INTERROGATORY NO. 62:
21	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
22	PERSONS who have information to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 63:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	DOCUMENTS to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 64:
	12
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	
4	SPECIAL INTERROGATORY NO. 65:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 66:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 67:
13	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
14	support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 68:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 69:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 70:
25	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
26	support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 71:
	13
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	PERSONS who have information to support that contention.
3	
4	SPECIAL INTERROGATORY NO. 72:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	DOCUMENTS to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 73:
9	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
10	support YOUR contention.
11	
12	SPECIAL INTERROGATORY NO. 74:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	PERSONS who have information to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 75:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	DOCUMENTS to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 76:
21	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
22	support YOUR contention.
23	
24	SPECIAL INTERROGATORY NO. 77:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	PERSONS who have information to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 78:
	14
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	DOCUMENTS to support that contention.
3	2 0 0 0 17221 172 to support that contains
4	SPECIAL INTERROGATORY NO. 79:
5	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
6	support YOUR contention.
7	
8	SPECIAL INTERROGATORY NO. 80:
9	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
10	PERSONS who have information to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 81:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	DOCUMENTS to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 82:
17	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
18	support YOUR contention.
19	
20	SPECIAL INTERROGATORY NO. 83:
21	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
22	PERSONS who have information to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 84:
25	If YOU contend that "INSERT CONTENTION HERE" , please IDENTIFY all
26	DOCUMENTS to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 85:
	15
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	
4	SPECIAL INTERROGATORY NO. 86:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 87:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 88:
13	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
14	support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 89:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 90:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 91:
25	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
26	support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 92:
	16
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al 2 PERSONS who have information to support that contention. 3 4 SPECIAL INTERROGATORY NO. 93: 5 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al 6 DOCUMENTS to support that contention. 7 8 SPECIAL INTERROGATORY NO. 94:	1
3 4 SPECIAL INTERROGATORY NO. 93: 5 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al 6 DOCUMENTS to support that contention. 7	
4 SPECIAL INTERROGATORY NO. 93: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention. 7	
If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention.	
6 DOCUMENTS to support that contention. 7	
7	that
	that
8 SPECIAL INTERROGATORY NO. 94:	that
	that
9 If YOU contend that "INSERT CONTENTION HERE", please state all facts	
10 support YOUR contention.	
11	
12 SPECIAL INTERROGATORY NO. 95:	
If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al	1
PERSONS who have information to support that contention.	
15	
16 SPECIAL INTERROGATORY NO. 96:	
If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al	1
DOCUMENTS to support that contention.	
19	
20 SPECIAL INTERROGATORY NO. 97:	
21 If YOU contend that "INSERT CONTENTION HERE", please state all facts	that
22 support YOUR contention.	
23	
24 SPECIAL INTERROGATORY NO. 98:	
25 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY al	1
PERSONS who have information to support that contention.	
27	
28 SPECIAL INTERROGATORY NO. 99:	
17	
SPECIAL INTERROGATORIES, SET "ONE? TWO?"	

1	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
2	DOCUMENTS to support that contention.
3	2 0 0 0 1 1 2 1 2 0 0 0 0 pp o 10 11 m o o o o o o o o o o o o o o o o o
4	SPECIAL INTERROGATORY NO. 100:
5	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
6	support YOUR contention.
7	
8	SPECIAL INTERROGATORY NO. 101:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	PERSONS who have information to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 102:
13	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
14	DOCUMENTS to support that contention.
15	
16	SPECIAL INTERROGATORY NO. 103:
17	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
18	support YOUR contention.
19	
20	SPECIAL INTERROGATORY NO. 104:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	PERSONS who have information to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 105:
25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
26	DOCUMENTS to support that contention.
27	
28	SPECIAL INTERROGATORY NO. 106:
	18
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	
4	SPECIAL INTERROGATORY NO. 107:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 108:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
11	
12	SPECIAL INTERROGATORY NO. 109:
13	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
14	support YOUR contention.
15	
16	SPECIAL INTERROGATORY NO. 110:
17	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
18	PERSONS who have information to support that contention.
19	
20	SPECIAL INTERROGATORY NO. 111:
21	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
22	DOCUMENTS to support that contention.
23	
24	SPECIAL INTERROGATORY NO. 112:
25	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
26	support YOUR contention.
27	
28	SPECIAL INTERROGATORY NO. 113:
	19
	SPECIAL INTERROGATORIES, SET "ONE? TWO?"

PERSONS who have information to support that contention. SPECIAL INTERROGATORY NO. 114: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention. SPECIAL INTERROGATORY NO. 115: If YOU contend that "INSERT CONTENTION HERE", please state all facts that support YOUR contention. SPECIAL INTERROGATORY NO. 116: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all PERSONS who have information to support that contention. SPECIAL INTERROGATORY NO. 117: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention. SPECIAL INTERROGATORY NO. 117: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all DOCUMENTS to support that contention. SPECIAL INTERROGATORY NO. 118: If YOU contend that "INSERT CONTENTION HERE", please state all facts that support YOUR contention. SPECIAL INTERROGATORY NO. 119: If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all PERSONS who have information to support that contention.		
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13 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all 14 PERSONS who have information to support that contention. 15 16 SPECIAL INTERROGATORY NO. 117: 17 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all 18 DOCUMENTS to support that contention. 19 20 SPECIAL INTERROGATORY NO. 118: 21 If YOU contend that "INSERT CONTENTION HERE", please state all facts that support YOUR contention. 23 24 SPECIAL INTERROGATORY NO. 119: 25 If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all 26 PERSONS who have information to support that contention. 27	11	
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27 28 SPECIAL INTERROGATORY NO. 127: 21	25	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
28 SPECIAL INTERROGATORY NO. 127: 21	26	DOCUMENTS to support that contention.
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	28	SPECIAL INTERROGATORY NO. 127:
		21
SPECIAL INTERROGATORIES, SET UNE! TWO!		SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	If YOU contend that "INSERT CONTENTION HERE", please state all facts that
2	support YOUR contention.
3	
4	SPECIAL INTERROGATORY NO. 128:
5	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
6	PERSONS who have information to support that contention.
7	
8	SPECIAL INTERROGATORY NO. 129:
9	If YOU contend that "INSERT CONTENTION HERE", please IDENTIFY all
10	DOCUMENTS to support that contention.
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16	
17	Dated: DATE LAW OFFICES OF EUGENE E. KINSEY
18	
19	By:
20	EUGENE E. KINSEY, Attorneys for "NAMES OF CLIENTS"
21	
2223	
24	
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27	
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	22 SPECIAL INTERROGATORIES, SET "ONE? TWO?"

1	PROOF OF SERVICE BY MAIL
2	
3	STATE OF CALIFORNIA) ss.:
4 5	COUNTY OF ORANGE "Short Case Name", et al. CASE No. "CASE NO."
6	I am employed in the County of Orange, State of California, at 1198 Pacific Coast
7	Hwy Ste D-353, Seal Beach, CA 90740. I am over the age of 18 and not a party to the within action. My business address is 1198 Pacific Coast Hwy Ste D-353, Seal Beach, CA 90740.
8	On March 15, 2021, I served on interested parties in said action the within:
9	On Water 13, 2021, I served on interested parties in said action the within.
10	• SPECIAL INTERROGATORIES, SET ONE
11	
12	by placing a true copy thereof in sealed envelope(s) addressed as stated below.
13	Line M. Misheel Con
14	Lina M. Michael, Esq. Attorney No. 2 Address MICHAEL & ASSOCIATES 555 St Charles Dr Ste 204 Attorney No. 2 Address Goes Here
15 16	Thousand Oaks, CA 91360 Tel.: (805) 379-8505 Fax: (805) 379-8525
17	I am readily familiar with this firm's practice of collection and processing
18	correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Seal Beach, California, in
19	the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after
20	date of deposit for mailing in affidavit.
21	Executed on March 15, 2021, at Seal Beach, California.
22	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
23	
24	"Name of Person Doing Service"
25	(Type or print name) (Signature)
26	
27	
28	
	PROOF OF SERVICE