**in THE sUPERIOR COURT OF THE STATE OF WASHINGTON**

**IN AND FOR THE COUNTY OF KING**

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| **ADANE TEDLA,** as an individual**,** Plaintiff, vs.**CIARAN MELLY** and **JANE DOE MELLY,** as husband and wife, Defendants. |  | No. **PLAINTIFF’S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION TO THE DEFENDANTS**  |

TO: Ciaran Melly, Defendant;

 Please answer each of the following interrogatories separately, fully, in writing and under oath. Each answer must be as complete and straightforward as the information reasonably available to you permits after reasonable inquiry, including the information possessed by your attorneys or agents. If an interrogatory cannot be answered completely, answer it to the extent possible.

 The answers are to be signed by the person to whom they are addressed and must be served on all parties within thirty (30) days after the service of the interrogatories unless these interrogatories were served upon you along with the service of the summons and complaint in which case the answers must be served within forty (40) days.

 **NOTE**: Answers must be in compliance with the Civil Rules, Local Rules, and Washington State case law, including the duty set forth in CR 26(e).

**DEFINITIONS**

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

1. **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence giving rise to this lawsuit.
2. **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.
3. **HEALTH CARE PROVIDER** means a person who is licensed, certified, registered, or otherwise authorized by the law to provide health care in the ordinary course of business or practice of a profession.

**SUBMITTING PARTY’S CERTIFICATION**

The undersigned, attorneys for the Plaintiffs, certify that these interrogatories are appropriate to the facts of this case.

Dated this 12th day of May 2023.

 HABTEMARIAM LAW FIRM PLLC

 /s/ Neftalem Habtemariam

 HABTEMARIAM LAW FIRM PLLC

 Neftalem Habtemariam WSBA #44117

 Attorney for Plaintiff

/s/ Kalwaljit Thiara

 Kalwaljit Thiara, WSBA #56763

 Attorney for Plaintiff

**INTERROGATORIES**

**BACKGROUND - GENERAL**

**Interrogatory No. 1**: State your full name and any other names you have been known by during the last ten years, your present address, date of birth, and place of birth. In addition to your present address, state all other addresses at which you have resided for the past ten years and the dates you resided at each address.

**ANSWER:**

**Interrogatory No. 2**: Were you married at the time of the **INCIDENT**? If so, please state the name and current address of that spouse.

**ANSWER:**

**Interrogatory No. 3**: Please state your educational history beginning with high school, including the name of each institution attended, any degrees and honors received, and dates of attendance.

**ANSWER:**

**Interrogatory No. 4**: Please state your employment history beginning five years before the date of the **INCIDENT** through to the present, including the name and address of each employer and the dates of employment.

**ANSWER:**

**Interrogatory No. 5**: Have you ever been convicted of or pled guilty to a felony? And have you ever been convicted of or pled guilty to a misdemeanor involving dishonesty or false statement? If so, state for each:

(a) The name of the crime charged, and the crime convicted of;

(b) The date of the charge and conviction;

(c) The date and place of the conviction and sentence imposed; and

(d) The court and case number.

**ANSWER:**

**Interrogatory No. 6**: Have you been a party to any lawsuits, including bankruptcy and/or divorce proceedings, in the past ten years? If so, provide:

(a) a description of the nature of lawsuit;

(b) the names of parties (or case name);

(c) the court and cause number;

(d) the name of the attorney representing you;

(e) the name of any insurance company involved; and

(f) the outcome of lawsuit.

**ANSWER:**

**BACKGROUND – INCIDENT**

**Interrogatory No. 7**: Please state your driver’s license number, the date and state of issuance. Please describe any restrictions on your driver’s license from the date of the **INCIDENT** to the present. Additionally, if your driver’s license has ever been suspended or revoked, please state the date and the reason for any suspension or revocation.

**ANSWER:**

**Interrogatory No. 8**: At the time of the **INCIDENT**, did you have normal vision without the use of corrective lenses? If not, state:

(a) Whether or not you were wearing corrective lenses at the time of the **INCIDENT**;

(b) The name, address, and telephone number of the individual prescribing such lenses; and

(c) A description of the nature of your visual difficulties.

**ANSWER:**

**Interrogatory No. 9**: Were you performing activities, work, or services for any **PERSON** at the time of the **INCIDENT**? If so, provide the name, address, and phone number for each such **PERSON**.

**ANSWER:**

**Interrogatory No. 10**: Was the vehicle you were driving at the time of the **INCIDENT** owned by you? If not, state: the owner’s name, address, and telephone number; and whether you were authorized to use the vehicle and any restrictions on such authorization.

**ANSWER:**

**Interrogatory No. 11**: Did you, during the 24 hours prior to the **INCIDENT** consume *any* alcoholic beverage, *any* drug, or *any* medication of *any* kind? If so, state:

(a) The type or types of alcoholic beverage, drug, or medication;

(b) The amount of each;

(c) The time at which and the location where you took the alcoholic beverage, drug, or medication; and

(d) If you took a prescribed drug or medication, describe the condition for which it was taken and the name and address of the **HEALTH CARE PROVIDER** who prescribed it.

**ANSWER:**

**INCIDENT**

**Interrogatory No. 12**: Describe the **INCIDENT**, including a description of the location of the **INCIDENT**, where your trip began and your intended destination, the circumstances leading up to the **INCIDENT**, and any facts or circumstances you believe contributed to cause the **INCIDENT**.

**ANSWER:**

**Interrogatory No. 13**: Do you believe that any weather condition, road condition, lighting or visibility problem, or any other physical characteristic of the **INCIDENT** scene or the conditions that existed at the time of the **INCIDENT** contributed to or caused the **INCIDENT**? If yes, describe each such condition in detail and explain the reason why it contributed to or caused the **INCIDENT**.

**ANSWER:**

**Interrogatory No. 14:** At or within five minutes before the **INCIDENT** were you using a cell or mobile telephone? If the answer is “yes”, state the name, address, and telephone number of the person to whom you were speaking and indicate when the conversation concluded.

**ANSWER:**

**Interrogatory No. 15**: Was anyone cited for a traffic offense as a result of the **INCIDENT**? If so, please state who was cited, and state the charge, the disposition, and the court.

**ANSWER:**

**Interrogatory No. 16**: Identify each property damage estimate or invoice pertaining to any vehicle damaged as a result of this **INCIDENT**. Note: This interrogatory may be responded to by producing copies of any such property damage estimates and invoices.

**ANSWER:**

**INVESTIGATION/WITNESSES**

**Interrogatory No. 17**: Did any law enforcement personnel, insurance companies, or any other **PERSON**, other than your attorney, investigate the **INCIDENT**? If so, provide:

(a) The identity of each **PERSON** investigating the **INCIDENT**;

(b) The date or dates on which the investigation occurred; and

(c) At whose request the investigation was performed.

**ANSWER:**

**Interrogatory No. 18**: Please name all persons who were eyewitnesses to the **INCIDENT**, were at the scene of the **INCIDENT**, or who have first-hand knowledge regarding the facts and circumstances of the **INCIDENT** and provide a brief description of the person’s relevant knowledge. As to each such person, in addition to their name, please provide their address and telephone number.

**ANSWER:**

**Interrogatory No. 19**: Aside from Plaintiff’s **HEALTH CARE PROVIDERS**, please name all persons who have knowledge regarding the Plaintiff’s injuries and damages and provide a brief description of each person’s relevant knowledge. As to each such person, in addition to their name, please provide their address and telephone number.

**ANSWER:**

**Interrogatory No. 20**: Are you aware of any written and/or recorded statements made by any witness to the **INCIDENT** or any party to the lawsuit? If so, for each statement, please state:

(a) The name, address and telephone number of the person making the statement;

(b) The name, address and telephone number of the person taking the statement;

(c) The date on which the statement was taken or given;

(d) The form of the statement (e.g., written, recorded, transcribed, etc.); and

(e) Provide the name, address, and telephone number of the present custodian of each statement.

**ANSWER:**

**Interrogatory No. 21**: List any and all photographs, motion pictures, videos, slides, drawings, diagrams, maps, or other graphic or electronic representations depicting the **INCIDENT** scene, the vehicles, any property damage, or any injuries. For each such item state the name, address, and telephone number of the custodian of the item, the date it was created, and who created the item.

**ANSWER:**

**COMPLAINT & ANSWER**

**Interrogatory No. 22**: Please state whether any parties, including you and your spouse, are named incorrectly in the Complaint and provide the correct name.

**ANSWER:**

**Interrogatory No. 23**: Do you allege insufficiency of process or of service of process? If so, please state the facts upon which you base your allegations.

**ANSWER:**

**Interrogatory No. 24**: Does your answer to Plaintiff’s complaint set forth any affirmative defenses? If so, please state the facts upon which each affirmative defense is based.

**ANSWER:**

**Interrogatory No. 25**: Do you deny liability? If so, please state the facts supporting that denial.

**ANSWER:**

**Interrogatory No. 26**: Do you allege some other **PERSON** caused or contributed to the **INCIDENT**, and is therefore liable for its proportionate share of fault under RCW 4.22.070? If so, please state the name, address, and telephone number of each such **PERSON** and state the facts upon which you base your allegation that such **PERSON** caused or contributed to the **INCIDENT**.

**ANSWER:**

**INSURANCE**

**Interrogatory No. 27**: Do any insurance or indemnification policies exist that may satisfy part or all of a judgment that may be entered in this action; or to indemnify or reimburse for payments made to satisfy such judgment? If so, please state as to each insurance agreement or policy its complete contents, including:

(a) Name, address and telephone number of insurer or indemnitor;

(b) Name, address and telephone number of each named insured or indemnitee;

(c) Each type of coverage provided;

(d) Limits of each type of coverage provided;

(e) Amount of deductible as to each coverage;

(f) Policy period coverage;

(g) Policy number.

**NOTE:** This interrogatory may be responded to by producing a complete copy of the declaration page of each insurance agreement or policy. Plaintiff’s counsel has personal knowledge of multiple cases in which insurers failed to produce information pertaining to “umbrella” and other excess liability insurance policies when answering this interrogatory.  This interrogatory asks for ALL insurance policies.  All means ALL.  Failure to fully and truthfully provide ALL information about ALL insur­ance policies will result in a formal complaint to the Insurance Commissioner, and may result in a motion to the Court for sanctions, and other possible actions.

**ANSWER:**

**Interrogatory No. 28**: Have any of the insurers or indemnitors identified in your response to the preceding interrogatory denied, in whole or in part, coverage or indemnification for any of Plaintiff’s claims, or accepted defense of this action upon a reservation of rights? If so, please state as to each:

(a) Name, address and telephone number of the insurer or indemnitor;

(b) Contract language upon which the insurer or indemnitor bases its denial of coverage, indemnification, or reservation of rights;

(c) Reasons for the insurer or indemnitor’s denial of coverage, indemnification, or reservation of rights.

**ANSWER:**

**Interrogatory No. 29:** Do you have an Umbrella Insurance Policy or Excess Liability Insurance Policy? If so, please state as to each insurance agreement or policy its complete contents, including:

(a) Name, address and telephone number of insurer or indemnitor;

(b) Name, address and telephone number of each named insured or indemnitee;

(c) Each type of coverage provided;

(d) Limits of each type of coverage provided;

(e) Amount of deductible as to each coverage;

(f) Policy period coverage;

(g) Policy number.

NOTE: This interrogatory may be responded to by producing a complete copy of the declaration page of each insurance agreement or policy.

**ANSWER:**

**EXPERT WITNESSES**

**Interrogatory No. 30**: Identify each person you or your attorneys expect to testify at trial as an expert witness and for each such witness, state:

(a) The subject matter on which the expert is expected to testify;

(b) The substance of the facts and opinions to which the expert will testify; and

(c) A summary of the grounds for each such opinion;

**ANSWER**

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1.** Please produce all documents, declarations, affidavits, or other evidence that you have properly located in this action.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2.** Please produce all written or recorded statements relating to this incident that you, your attorney, or your investigators have taken from any person or that you or your attorney have in your possession. If you assert that certain documents are protected under attorney work product rule, identify each such document with specificity in your objection.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3**. Please produce all photographs (or videotapes) that show the vehicles involved in this accident and any other photographs relating to the accident or damage.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4.** Please produce copies of any invoices and/or any damage estimates to Defendant’s and Plaintiff’s vehicles damaged as a result of this incident.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 5**: Please produce all notes, test results, reports, Curriculum Vitae, and other writings prepared by each expert witness that you or your attorney’s expert to testify at trial as an expert witness.

**RESPONSE:**

ANSWERS AND OBJECTIONS DATED this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2023.

**DECLARATION OF RESPONDING PARTY**

I declare under the penalty of perjury under the laws of the State of Washington that I am the Defendant in this action OR I am the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and am authorized to make the foregoing answers. I declare that I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

Dated this \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Washington.

Defendant