

## ANSWERS TO SPECIAL INTERROGATORIES

Sample Only  
Use At Your Own Risk



PROPOUNDING PARTY: \_\_\_\_\_

RESPONDING PARTY: \_\_\_\_\_

SET NUMBER: \_\_\_\_\_

COMES NOW the \_\_\_\_\_, \_\_\_\_\_ and responds to the \_\_\_\_ set of Special Interrogatories propounded by \_\_\_\_\_, \_\_\_\_\_, as follows:

This responding party has responded to all of the Interrogatories to the extent that information has become known by this responding party. However, this responding party's discovery and investigation in preparation for trial of this matter has not been completed as of the date of these responses to Interrogatories and, therefore, they do not purport to state herein anything more than information presently known or discovered. This responding party specifically reserves the right to continue discovery and investigation in this matter for facts, witnesses, and supporting evidence and data that may reveal information which if it had been presently within our knowledge, would be included in these responses.

Consequently, to the extent that the Interrogatories identify "all document, etc.", they are responded to fully insofar as said responding party is presently aware of such date; and this responding party is not precluded from presenting evidence at trial discovered after the date of these responses to Interrogatories. This preliminary statement is incorporated into each and every response set forth below.

**RESPONSE TO SPECIAL INTERROGATORY NO <>:**

**RESPONSE TO SPECIAL INTERROGATORY NO <>:**

**RESPONSE TO SPECIAL INTERROGATORY NO <>:**

DATE:

\_\_\_\_\_ [Name]  
Defendant In Pro Per

**VERIFICATION**

I, \_\_\_\_\_, am a \_\_\_\_\_ in the above-entitled action. I have read the foregoing *ANSWERS TO SPECIAL INTERROGATORIES* and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at \_\_\_\_\_, California.

Date: \_\_\_\_\_  
\_\_\_\_\_ [Name]

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