

STATE OF NEW STATE )  
 )  
COUNTY OF METROPOL )  
 )  
ALBERT MALAGUER, )  
 )  
 )  
Plaintiff )  
 )  
v. )  
 )  
CYLAB, INC., )  
 )  
 )  
Defendant. )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
CIVIL ACTION NO. YR-2-CP-10-4796

**DRAFT**

**DEFENDANT'S RESPONSES TO  
PLAINTIFF'S INTERROGATORIES**

The Defendant CyLab, Inc. hereby responds to the Interrogatories propounded by Plaintiff as follows:

1. Give the names and addresses of persons known to Defendant or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

- ANSWER:**
- a. Albert Malaguer  
2727 Lenwood Boulevard  
Pralog, New State
  - b. Betty Lou Malaguer  
2727 Lenwood Boulevard  
Pralog, New State
  - c. Dr. James J. Hinchey  
2914 Rivers Avenue  
Pralog, New State

2. Set forth a list of photographs, videos, plats, sketches or other prepared documents in possession of the Defendant that relate to the claim or defense in this case.

**ANSWER:** The Defendant objects to this Interrogatory as seeking materials beyond the scope of discovery under Rule 26. The objection notwithstanding, there are no such documents or materials in the defendant's possession, custody or control other than those protected by attorney work product.

3. Set forth the names and addresses of all insurance companies which have liability insurance coverage relating to the claim and set forth the number or numbers of the policies involved and the amount or amounts of liability coverage provided in each policy, including all underinsured policies which may be applicable.

**ANSWER:** Not applicable.

4. List the names and addresses of any expert witnesses whom the Defendant proposes to use as a witness at the trial of the case.

**ANSWER:** The Defendant has not made a determination at this time as to whether it will use any expert witnesses at the trial of the case. However, it reserves the right to designate such experts at the time that the determination is made.

5. For each person known to the Defendant or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the Plaintiff of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

**ANSWER:** Mr. and Mrs. Malaguer have information concerning their purchase of Defendant's product and its use. Dr. Hinchey is the Plaintiff's primary treating physician and has information concerning the Plaintiff's medical condition.

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William Tildreth Sterling, Jr  
Harvey Gorman  
Sterling & Morgan  
Top of the Park Plaza  
Metropol, New State 04045-04000

December \_\_\_\_\_, YR-2

STATE OF NEW STATE )  
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COUNTY OF METROPOL )  
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ALBERT MALAGUER, )  
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Plaintiff, )  
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CYLAB, INC., )  
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Defendant )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
CIVIL ACTION NO. YR-2-CP-10-4796

**VERIFICATION**

I have read the foregoing Responses to Interrogatories and certify that they are, to the best of my knowledge, true and correct.

CyLab, Inc.

\_\_\_\_\_

Sworn before me this

\_\_\_\_\_ of December YR-2.

\_\_\_\_\_  
Notary Public for the state of New State  
My commission expires\_\_\_\_\_.

STATE OF NEW STATE	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF METROPOL	)	CIVIL ACTION NO. YR-2-CP-10-4796
	)	
ALBERT MALAGUER,	)	
	)	
Plaintiff	)	
	)	
v.	)	<b><u>DEFENDANT'S RESPONSES TO</u></b>
	)	<b><u>PLAINTIFF'S INTERROGATORIES</u></b>
CYLAB, INC.,	)	
	)	
Defendant.	)	
_____	)	

The Defendant CyLab, Inc. hereby responds to the Interrogatories propounded by Plaintiff as follows:

1. Give the names and addresses of persons known to Defendant or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

- ANSWER:**
- a. Albert Malaguer  
2727 Lenwood Boulevard  
Pralog, New State
  - d. Betty Lou Malaguer  
2727 Lenwood Boulevard  
Pralog, New State
  - e. Dr. James J. Hinchey  
2914 Rivers Avenue  
Pralog, New State

2. Set forth a list of photographs, videos, plats, sketches or other prepared documents in possession of the Defendant that relate to the claim or defense in this case.

**ANSWER:** The Defendant objects to this Interrogatory as calling for attorney product and material that is the subject of the attorney-client privilege.

Privileged, confidential or otherwise protected material or attorney work product:  
surveillance videotape of Plaintiff Malaguer.

3. Set forth the names and addresses of all insurance companies which have liability insurance coverage relating to the claim and set forth the number or numbers of the policies involved and the amount or amounts of liability coverage provided in each policy, including all underinsured policies which may be applicable.

**ANSWER:** Not applicable.

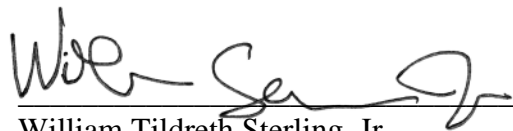
4. List the names and addresses of any expert witnesses whom the Defendant proposes to use as a witness at the trial of the case.

**ANSWER:** The Defendant has not made a determination at this time as to whether it will use any expert witnesses at the trial of the case. However, it reserves the right to designate such experts at the time that the determination is made.

5. For each person known to the Defendant or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the Plaintiff of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

**ANSWER:** Mr. and Mrs. Malaguer have information concerning their purchase of Defendant's product and its use. Dr. Hinchey is the Plaintiff's primary treating physician and has information concerning the Plaintiff's medical condition.

January 5, YR-1

  
\_\_\_\_\_  
William Tildreth Sterling, Jr.  
Harvey Gorman  
Sterling & Morgan  
Top of the Park Plaza  
Metropol, New State 04045-04000

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IN THE COURT OF COMMON PLEAS  
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**VERIFICATION**

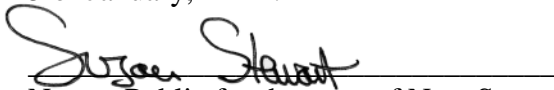
I have read the foregoing Responses to Interrogatories and certify that they are, to the best of my knowledge, true and correct.

CyLab, Inc.



Sworn before me this

5 of January, YR-1.



Notary Public for the state of New State  
My commission expires December 6, YR-4