

INTRODUCTION

Scope. -- These standard interrogatories have been approved by the Court of Common Pleas of Dauphin County for use in all matters subject to Rule 4001 of the Pennsylvania Rules of Civil Procedure. A standard Interrogatory should be used only where relevant to the facts of the case and should be designated as a Dauphin County Standard Interrogatory (e.g., "D.C.S.I. No. 101"). Each standard Interrogatory, including subparts, constitutes one (1) Interrogatory for the purpose of Dauphin County Local Rule 4005. The subject headings are for organizational purposes only and do not limit the otherwise proper use of the Interrogatory for other subjects. A standard Interrogatory is presumptively permissible where relevant, and objections thereto generally will not be indulged.

GENERAL (Nos. 101 to 116)

Personal Information. -- State:

- (a) Your full name;
- (b) Each other name, if any, which you have used or by which you have been known;
- (c) The name of your spouse at the time of the accident and the date and place of your marriage to such spouse;
- (d) The address of your present resident and the address of each other residence which you have had during the past five years;
- (e) Your present occupation and the name and address of your employer;
- (f) Date of your birth;
- (g) Your Social Security Number;
- (h) Your military service and positions held, if any; and
- (i) The schools you have attended and the degrees of certificates awarded, if any.

Insurance. -- If you are covered by any type of insurance, including any excess or umbrella insurance, that might be applicable to the incident in this matter, state the following with respect to each such policy.

- (a) The name of the insurance carrier which issued the policy;
- (b) The named insured under each policy and the policy number of each policy;
- (c) The type(s) and effective date(s) of each policy;
- (d) The amount of coverage provided for injury to each person, for each occurrence, and in the aggregate for each policy; and
- (e) Each exclusion, if any, in the policy which is applicable to any claim thereunder and any reasons, if any, why you or the carrier claim the exclusion is applicable.

D.C.S.I. No. 102

Expenses. -- List and describe all expenses and losses that you have incurred because of the incident.

D.C.S.I. No. 103

Factual basis for claims and defenses. -- State with particularity the factual basis for each claim or defense you are asserting in this case.

D.C.S.I. 104

Witnesses. --

- (a) Identify each person who:
 - (1) Was a witness to the incident through sight or hearing; and/or
 - (2) Has knowledge of facts concerning the happening of the incident or conditions or circumstances at the scene of the incident prior to, at the time of, or after the incident.
- (b) With respect to each person so identified, state that person's exact location and activity at the time of the incident.

D.C.S.I. No. 105

Statements. -- If you know of anyone that has given any statement (as defined by the Rules of Civil Procedure) concerning this action or its subject matter, state:

- (a) The identity of such person;
- (b) When, where, by whom, and to whom each statement was made and whether it was reduced to writing or otherwise recorded; and
- (c) The identity of any person who has custody of any such statement that was reduced to writing or otherwise recorded.

D.C.S.I. No. 106

Reports of incident. -- Identify documents (except reports of experts subject to Pa.R.C.P. No. 4003.5) which describe the incident or the cause thereof.

D.C.S.I. No. 107

Licensure. -- If you were required by law or regulation to be licensed for the activity in which you were engaged at the time of the incident, state:

- (a) The type of license required;
- (b) The date you first obtained such a license;
- (c) The dates of issuance and expiration of your current license(s);
- (d) The identity of the authority that issued your license(s);
- (e) The number of your license(s);
- (f) The nature and duration of any revocation or suspension of your license(s);
and
- (g) The special restrictions, if any, imposed on your license.

D.C.S.I. No. 108

Criminal charges related to incident. -- If you have been charged with any criminal violations as a result of the incident, describe the charges and identify all documents filed or served in connection with those charges.

D.C.S.I. No. 109

Demonstrative evidence. -- If you know of the existence of any photographs, motion pictures, video recordings, maps, diagrams, or models relevant to the incident, state:

- (a) The nature or type of such item;
- (b) The date when such item was made;
- (c) The identity of the person that prepared or made each item; and
- (d) The subject that each item represents or portrays.

D.C.S.I. No. 110

Trial preparation material. -- If you, or someone not an expert subject to Pa.R.C.P.

No. 4003.5, conducted any investigations of the incident, identify:

- (a) Each person and the employer of each person who conducted any investigation(s); and
- (b) All notes, reports, or other documents prepared during or as a result of the investigation(s) and the persons who have custody thereof.

D.C.S.I. No. 111

Trial witnesses. -- Identify each person you intend to call as a non-expert witness at the trial of this case, and for each person identified state your relationship with the witness and the substance of the facts to which the witness is expected to testify.

D.C.S.I. No. 112

Expert Witnesses. -- Identify each expert you intend to call as a witness at the trial of this matter, and for each expert state:

- (a) The subject matter about which the expert is expected to testify; and
- (b) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion. (You may file as your answer to this Interrogatory the report of the expert or have the Interrogatory answered by your expert.)

D.C.S.I. No. 113

Trial exhibits. -- Identify all exhibits that you intend to use at the trial of this matter and state whether they will be used during the liability or damages portions of the trial.

D.C.S.I. No. 114

Books, magazines, etc. -- If you intend to use any book, magazine, or other such writing at trial, state:

- (a) The name of the writing;
- (b) The author of the writing;
- (c) The publisher of the writing;
- (d) The date of publication of the writing; and
- (e) The identity of the custodian of the writing.

D.C.S.I. No. 115

Admissions. -- If you intend to use any admission(s) of a party at trial, identity such admission(s).

D.C.S.I. No. 116

PERSONAL INJURY (Nos. 201 to 208)

Injuries and diseases alleged. -- Identify all injuries or diseases that you allege you suffered as a result of the incident.

D.C.S.I. No. 201

Prior or subsequent injuries or diseases. -- If, either prior to or subsequent to the incident, you suffered any injury or disease in those portions of the body claimed by you to have been affected by the incident, state:

- (a) The injury or disease you suffered;
- (b) The date and place of any accident, if such injury or disease was caused by an accident;
- (c) The identity of hospitals, doctors, or practitioners who rendered treatment or examination because of such injury or disease; and
- (d) The identity of anyone against whom a claim was made, and the tribunal and docket number of any claim or lawsuit that was filed in connection with such injury or disease.

D.C.S.I. No. 202

Medical treatment. -- If you received medical treatment or examination (including x-rays) because of injury or disease you suffered as a result of the incident, state:

- (a) The identity of each hospital at which you were treated or examined;
- (b) The date on which each such treatment or examination at a hospital was rendered and the charge by the hospital for each;
- (c) The identity of each doctor or practitioner by whom you were treated or examined;
- (d) The date on which each such treatment or examination by a doctor or practitioner was rendered and the charge for each; and
- (e) The identity of any document(s) (except reports of experts subject to Pa.R.C.P. 4003.5) regarding any medical treatment or examination, setting forth the author and date of such document(s).

D.C.S.I. No. 203

Earnings before the incident. -- For the period of three years immediately preceding the date of the incident, state:

- (a) The name and address of each of your employers or, if you were self-employed during any portion of that period, each of your business addresses and the name of the business while self-employed;
- (b) The dates of commencement and termination of each of your periods of employment or self-employment;
- (c) The nature of your occupation in each employment or self-employment; and
- (d) The wage, salary, or rate of earnings received by you in each employment or self-employment and the amount of income from employment and self-employment for each year.

D.C.S.I. No. 204

Earnings after the incident. -- If you have engaged in one or more gainful occupations subsequent to the date of the incident, state:

- (a) The name and address of each of your employers or, if you were self-employed at anytime subsequent to the incident, each of your business addresses and the name of the business while self-employed;
- (b) The dates of commencement and termination of each of your periods of employment or self-employment;
- (c) The nature of your occupation in each employment or self-employment;
- (d) The wage, salary, or rate of earnings received by you in each employment or self-employment and the amount of income from employment and self-employment for each year; and
- (e) The date(s) of any absence(s) from your occupation resulting from any injury or disease suffered in this incident and the amount of any earnings or other benefits lost by you because of such absence(s).

D.C.S.I. No. 205

Limitation of duties and activities after the incident. -- If, as a result of this incident, you have been unable to perform any of your customary occupational duties or social or other activities in the same manner as prior to the incident, state with particularity:

- (a) The duties and/or activities you have unable to perform;
- (b) The periods of time you have been unable to perform; and
- (c) The identity of all persons having knowledge thereof.

D.C.S.I. No. 206

Substance impairment. -- If you consumed any alcoholic beverage, sedative, tranquilizer, marijuana, cocaine, hashish, or other drug, medicine, or pill during the eight hours immediately preceding the incident, state:

- (a) The nature, amount, and type of item consumed;
- (b) The amount of time over which consumed;
- (c) The identity of any and all persons who have any knowledge as to the consumption of those items; and
- (d) The identity of the physician or medical practitioner or other person who gave, purchased, or prescribed any of said items, if any.

D.C.S.I. No. 207

Physical or mental disability. -- If you were under any physical or mental disability at the time of the incident, explain the disability.

D.C.S.I. No. 208

MOTOR VEHICLE ACCIDENTS (Nos. 301 to 304)

Motor vehicle information. -- With respect to all motor vehicles involved in the incident, state:

- (a) The identities of the owner(s) and operator(s) of each vehicle;
- (b) The identity of the passenger(s) in each vehicle, if any; and
- (c) The make, model, and year of each vehicle.

D.C.S.I. No. 301

Motor vehicle damage. -- With respect to any vehicle you owned that was involved in the incident, state:

- (a) The nature of any damage existing prior to the incident;
- (b) The identity of any person who performed repairs to the vehicle following the incident;
- (c) The total amount of the repair bill(s), or if not yet repaired, the total estimated cost of repairing the vehicle or the estimated value of the damages to the vehicle (include the identity of the person furnishing any such estimate);
- (d) The date and place of last state inspection prior to the incident and identify the person making said inspection; and
- (e) The nature of any defect in or problem with the vehicle and the length of time such defect or problem existed.

D.C.S.I. No. 302

Motor vehicle operation. -- With respect to the vehicle you operated or in which you were a passenger, state:

- (a) The destination and the point and time of departure of the vehicle;
- (b) The purpose of the trip or journey in the vehicle;
- (c) The time and place of all stops and departures between the commencement of the trip or journey and the time of the incident;
- (d) Whether the operator of the vehicle was familiar with the surrounding area of the incident; and
- (e) The weather conditions at the time of the incident, including visibility and roadway conditions.

D.C.S.I. No. 303

Motor vehicle accident causation. -- State in detail the manner in which you assert that the incident occurred, specifying the speed, position, direction, and location of each vehicle involved during its approach to, at the time of, and immediately after the collision.

D.C.S.I. No. 304

PRODUCT LIABILITY (Nos. 401 to 422)

Manufacture. -- With respect to the product involved in the incident, state:

- (a) The date of manufacture;
- (b) The place of manufacture;
- (c) The identity of the person or entity that manufactured the product;
- (d) All serial numbers, model numbers, part numbers, or any other identifying markings numbers or stickers utilized by the manufacturer to identify the product, the location of such marking, and any information regarding the product or its manufacture incorporated into the identifying number (e.g., date of manufacture, size of components, etc.)

D.C.S.I. No. 401

Design. -- With respect to the product involved in the incident, identify each of the following persons or entities:

- (a) The person or engineering group that generated the design drawings for the product;
- (b) The engineer or engineering group that approved the final design of the product;
- (c) The engineer or engineering group that conducted design testing of the product for the original design or for any modification to the original design effecting the product at issue within the 10 years prior to the incident;
- (d) The engineer or engineering group that wrote any specifications concerning components to be utilized in the manufacture of the product and/or the manufacturing tooling or methods to be utilized in assembling the components into the finished product.

D.C.S.I. No. 402

Identity of production participants. -- With respect to the product involved in the incident, identify:

- (a) The manufacturer of every component utilized in the product;
- (b) The plant supervisor or production manager of the plant in which the product was manufactured at or near the date of manufacture;
- (c) The supervisor of the production line on which the product was manufactured;
- (d) The person who conducted any quality control procedures on the product;
- (e) The person who supervised the quality control procedures utilized on the product;
- (f) The person who wrote and approved the quality control procedures utilized on the product at the time of manufacture; and
- (g) The person whose duties included evaluating the cost of manufacturing the product.

D.C.S.I. No. 403

Design testing. -- With respect to any design testing conducted by you regarding [to be filled in with the design question to the particular case]:

- (a) Describe the test procedures;
- (b) State the purpose of conducting the test;
- (c) State the results of the test and the design criteria generated from the test;
and
- (d) Identify the person who was in charge of the testing procedures.

D.C.S.I. No. 404

Manufacturing Process. -- Describe the manufacturing process for product involved in the incident.

D.C.S.I. 405

Quality control. -- For every quality control test or procedure utilized by you to test a raw material, the final product, or any portion of the process of converting the raw material into the final product involved in the incident, provide a description of:

- (a) The quality control test and its procedure;
- (b) The characteristic which was being tested and what constituted a "failure" of the quality control test;
- (c) What was done by you when a product or part failed each quality control test;
- (d) The frequency of the quality control test and the number of parts tested by each; and
- (e) All evidence which shows that the part involved in the incident conformed to your quality control standards.

D.C.S.I. No. 406

Specifications. -- If the product involved in the incident was manufactured to conform to any written specifications, whether generated by your own engineering employees or set by a governmental agency or any voluntary standard-making body, describe the specifications and identify:

- (a) All documents relating to the specifications; and
- (b) All persons or entities that may have evidence of your conformance to the specifications.

D.C.S.I. No. 407

Possession and acquisition of product. -- With respect to the product involved in the incident, state:

- (a) The date on which the product was purchased or acquired by the person or company which owned it at the time of the incident;
- (b) Whether the product was purchased or acquired in a new or used condition;
- (c) The identity of all prior owners or possessors of the product and the dates of their ownership or possession; and
- (d) All identifying markings, numbers, or stickers utilized by any prior owner or possessor to identify the product, the location of such marking(s), and any information regarding the product incorporated into the marking(s).

D.C.S.I. No. 408

Documents of sale and ownership. -- Identify all documents relating to the sale, possession, ownership, or transfer of the product involved in the incident and the persons who have custody of those documents or copies thereof.

D.C.S.I. No. 409

Warranties. -- Identify every written and non-written warranty which is applicable to the product involved in the incident.

D.C.S.I. No. 410

Product literature. -- Identify all instruction, operating, repair, maintenance, and safety manuals regarding the product involved in the incident and any other documents which describe the product or its use.

D.C.S.I. No. 411

Present location of product. -- State the present location of the product involved in the incident and identify the person who has custody thereof.

D.C.S.I. No. 412

Repairs before the incident. -- With respect to the product involved in the incident,

state:

- (a) Every repair or replacement made to the product before the incident;
- (b) The identity and employer of any person who made each repair or replacement;
- (c) The nature, purpose, and date of each repair or replacement; and
- (d) The identity of any document referring to each repair or replacement and the persons who have custody thereof.

D.C.S.I. No. 413

Alterations before the incident. -- With respect to the product involved in the incident, state:

- (a) Every pre-incident alteration or addition made to the product after it left the possession of its manufacturer;
- (b) The identity and employer of any person who made each alteration or addition;
- (c) The nature, purpose, and date of each alteration or addition;
- (d) The identity of any document referring to each alteration or addition and the persons who have custody thereof; and
- (e) Whether you contend the alteration or addition was a substantial factor in the incident and, if so, the factual basis for that contention.

D.C.S.I. No. 414

Complaints and malfunctions before the incident. -- If, before the incident, there were any complaints or malfunctions regarding the product involved in the incident, state:

- (a) The substance of any complaints or malfunctions;
- (b) The date(s) when any complaints or malfunctions occurred;
- (c) The identity of the person(s) who made any such complaints or experienced any such malfunctions;
- (d) Whether the complaints or malfunctions are documented and the identification of the persons who prepared the documents; and
- (e) Whether there were any oral reports made pursuant to any complaints or malfunctions.

D.C.S.I. No. 415

Training and instruction before the incident. -- Describe all pre-incident training and instruction which you gave or received for the operation, use, or maintenance of the product involved in the incident, including any classroom instruction or on-the-job training.

D.C.S.I. No. 416

Inspections or examinations. -- If there were any inspections or examinations of the product involved in the incident, either before or after the incident, state:

- (a) The purpose of such inspection(s) or examination(s);
- (b) When any inspections or examinations were scheduled to be made and by whom;
- (c) The dates when any inspections or examinations were made and by whom;
- (d) Whether there is any documentation relating to the schedule of the inspections or examinations (if so, identify such documentation); and
- (e) Whether there were oral reports made with respect to any inspections or examinations (if so, identify such oral reports).

D.C.S.I. No. 417

Product tests. -- If you, or someone not an expert subject to Pa.R.C.P. No. 4003.5, performed a test before or after the incident on the product involved in the incident, state:

- (a) The identity of the persons who performed the test(s);
- (b) The date on which any test was performed;
- (c) The manner in which any test was performed; and
- (d) The purpose of any test and its results.

D.C.S.I. No. 418

Recalls, recommendations, and warnings. -- With respect to the product involved in the incident, identify:

- (a) All recalls, recommendations, or warnings; and
- (b) Any persons who have custody of any document(s) referred to in your answer.

D.C.S.I. No. 419

Alterations after the incident. -- With respect to the product involved in the incident,

state:

- (a) Every alteration or addition to the product after the incident;
- (b) The identity and employer of any person who authorized and made any alteration or addition;
- (c) The nature, purpose, and date of each alteration or addition; and
- (d) The identity of any document referring to any alteration or addition and the persons who have custody thereof.

D.C.S.I. No. 420

Repairs after the incident. -- With respect to the product involved in the incident, state:

- (a) Every repair or replacement made to the product after the incident;
- (b) The identity and employer of any person who authorized or made any repair or replacement;
- (c) The nature, purpose, and date of each repair or replacement; and
- (d) The identity of any document referring to each repair or replacement and the persons who have custody thereof.

D.C.S.I. No. 421

Misuse or abuse. -- If you contend that the product was misused or abused between the date of its manufacture and the date of the incident, state the factual basis for such contention.

D.C.S.I. No. 422

MEDICAL MALPRACTICE (Nos. 501 to 515)

Cause of injuries. -- Identify each person that you claim caused your injury and, with respect to each such person, state whether you claim that:

- (a) He/she was not qualified to undertake the type of treatment, surgery, or examination he/she gave;
- (b) He/she failed to diagnose your injury correctly;
- (c) He/she did not obtain proper consent or authorization;
- (d) He/she did not maintain proper standards of hygiene or sterilization;
- (e) He/she failed to use modern techniques and procedures;
- (f) He/she did not give the correct treatment;
- (g) He/she failed to observe proper preoperative, operative, or postoperative procedures, specifying which; or
- (h) He/she was otherwise negligent (specifying the nature of the negligence).

D.C.S.I. No. 501

Relationship between hospital and practitioner. -- Identify each and every contract or other document establishing or otherwise referring to the relationship between [hospital] and [practitioner], and/or document relating to the privileges granted by [hospital] to [practitioner].

D.C.S.I. No. 502

Professional contracts. -- Set forth the date(s) you had professional contact with the plaintiff/patient and the nature of such contract.

D.C.S.I. No. 503

Informed consent. -- If lack of informed consent is pleaded in the Complaint, then, with respect to any conversation of which you are aware in which the nature of, alternatives to, and/or risks of the procedure in question were discussed with the plaintiff/ patient, set forth the following:

- (a) The date(s) of each conversation;
- (b) The substance of each conversation;
- (c) The identity of each party to the conversation;
- (d) The identity of each witness to the conversation; and
- (e) Whether there were any documents relating to the nature of, alternative to, and/or risk of the procedure presented to the plaintiff/patient.

D.C.S.I. No. 504

Rules, regulations, and guidelines. -- Identify each rule, regulation, guideline, instruction, or other recommendation, manual, handbook, collection of orders or notices or other documents regarding the [procedure] at [hospital] in [month, year of occurrence].

D.C.S.I. No. 505

Education. -- Set forth the following details regarding your professional education and preparation for practice:

- (a) Professional school(s) attended, date(s) of attendance, and year(s) of graduation;
- (b) Place(s) and period(s) of internship;
- (c) Nature of subjects covered during internship;
- (d) Names and specialties of practitioners who trained you during internship;
- (e) Place(s) and period(s) of residency;
- (f) Subject to residency;
- (g) Names and specialties of practitioners who trained you during residency;
- (h) Nature and period of any graduate studies and place(s) where pursued;
- (i) Inclusive dates of any armed forces service; and
- (j) Nature of armed forces service, if any, including nature of any professional experience.

D.C.S.I. No. 506

Professional organizations. -- Identify each professional organization with which you are affiliated or of which you are a member.

D.C.S.I. No. 507

Certifications. -- If you have ever been certified by any specialty board, or if you are now or have ever been a member of any specialty board, set forth the following:

- (a) The name and address of each specialty board;
- (b) The date you were certified or became a member; and
- (c) If you are no longer certified or a member, give the date your certification or membership was terminated and the reason for such termination.

D.C.S.I. No. 508

Publications authored. -- Identify all publications, including but not limited to papers, journal articles, letters to the editor, textbooks, symposiums, etc., which you authored or contributed to, including the title of the work, the name of the periodical or book in which it was printed, the pages you wrote, and the date of its printing.

D.C.S.I. No. 509

510. **Textbooks.** -- State the author, title, and year of publication of every textbook in [subject/specialty] which you had in your office from [relevant years].

D.C.S.I. No. 510

Periodicals. -- Set forth the name of each professional journal you subscribed to in
[relevant years].

D.C.S.I. No. 511

Professional experience. -- Identify each office, clinic, or other location relating to your practice or in which you otherwise worked subsequent to your internship or residency, and set forth the inclusive dates you maintained or otherwise worked at each such location.

D.C.S.I. No. 512

Hospital affiliations. -- Identify all hospitals with which you were affiliated prior to [relevant years] and, with respect to each such hospital, set forth your position(s) and responsibilities.

D.C.S.I. No. 513

Professional associations. -- Identify any association or partnership with any other medical practitioner at the time of the incident.

D.C.S.I. No. 514

Consultations. -- If you ever consulted with any other practitioner in connection with the care and treatment of the plaintiff/patient, set forth:

- (a) The date(s) of the consultation;
- (b) The identity of the practitioner;
- (c) The subject matter of the consultation;
- (d) Action taken as a result of the consultation; and
- (e) The identity of any documents relating to the consultation.

D.C.S.I. No. 515