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NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
90 CVD 13896

WAKE COUNTY

SUSIE HAIR,
Plaintiff

v.

QUAIL CORNERS ANIMAL HOSPITAL,
ITS EMPLOYEES AND AGENTS; JAMES
H. JACKSON, DVM; JAMES P. HASSINGER,
DVM,
Defendants

PLAINTIFF'S FIRST SET OF INTERROGATORIES

To: Quail Corners Animal Hospital
c/o James H. Jackson, DVM
1613 E. Millbrook Rd.
Raleigh, NC 27609

Plaintiff herewith serves upon you the following written interrogatories pursuant to Rule 33 of the Rules of Civil Procedure. Since said defendant is a corporation, you are required to select such officer or agent of said corporation as can furnish such information in answer to each interrogatory as is available to said officer or agent. You are required to have these interrogatories answered separately and fully in writing under oath and to serve a copy of your answers on the attorney for plaintiff within thirty (30) days of service thereof.

Pursuant to Rule 26 of the Rules of Civil Procedure, these interrogatories shall be continuing in nature until the date of trial and you are required to serve supplemental answers as additional information may become available to you.

1. State fully, completely, and at length the factual basis of every defense which you now assert or will assert in this action.

2. State the name, occupation, business address, and telephone number of each witness you expect to call or rely upon in the trial of this action, together with a summary of the matters to be testified about within the knowledge of each witness.

3. State at length and verbatim the contents of each and every document, writing, paper, or letter which you intend to utilize as a basis or ground for any defense in this action or which you intend to offer into evidence upon the trial of this action. In addition, state the date and circumstances of preparation or receipt of each such item. If you will do so without a Motion to Produce, attach to your answers to these interrogatories a copy of each and every such document, writing, paper or letter.

This the _____ day of January, 1991.

MARIANNA R. BURT
Attorney for Plaintiff
P.O. Box 768, Apex, NC 27502
919/362-5653