

SAMPLE - MEET AND CONFER SROGS

Special Interrogatory No. 6 In accordance with the Code of Civil Procedure, it is imperative that each answer provided in response to interrogatories be as complete and straightforward as reasonably possible based on the information available to the responding party (CCP § 2030.220(a)). If an interrogatory cannot be fully answered, it should still be addressed to the extent feasible (CCP § 2030.220(b)). Moreover, if the responding party lacks personal knowledge necessary for a comprehensive response, this must be stated, accompanied by a genuine effort to obtain such information through reasonable means (CCP § 2030.220).

Defendant has access to and can provide the name, address and telephone number of any employees and/or workers that assisted Plaintiff in any matter (sic) after the INCIDENT.

Special Interrogatory No. 7, 8, 9, 10, and 11: The defendant has provided limited information, identifying only one **video surveillance** location that purportedly covers the entire premises where the incident occurred. Moreover, the defendant has declined to disclose any additional videos or surveillance locations, including whether there are multiple cameras and their respective locations, as well as any equipment identifying factors such as camera identification numbers. Special Interrogatories 7-11 seek specific details regarding the number and locations of cameras within a 100-foot radius, what points at the Incident location, along with instructions on how to reference them for potential subpoena and evidence preservation purposes during trial.

Special Interrogatory No. 7 Defendants' objects to a discovery request of **identifying the number of video/surveillance** for discovery purposes. However, California Code of Civil Procedure §2017.010 provides that parties may obtain discovery regarding any matter that is relevant to the subject matter involved in the pending action or to the determination of any motion made in that action. This includes information that may lead to the discovery of admissible evidence, as well as information that is reasonably calculated to lead to the discovery of admissible evidence. The discovery request is clear. The Defendant is aware of the location(s) and is able to provide our discovery request.

Special Interrogatory No. 8 Defendant objects to a discovery **request of identifying the number and location of all the video/surveillance** for discovery purposes. However, California Code of Civil Procedure §2017.010 provides that parties may obtain discovery regarding any matter that is relevant to the subject matter involved in the pending action or to the determination of any motion made in that action. This includes information that may lead to the discovery of admissible evidence, as well as information that is reasonably calculated to lead to the discovery of admissible evidence. The discovery request is clear. The Defendant is aware of the location and is able to provide the identifying number(s) and location(s) of all the video/surveillance within 100 feet.

Here the Defendant partially answers the question and has omitted how many cameras, the identifying number(s), and the location "outdoor quad area" is vague and broad.

Special Interrogatory No. 9 Defendant objects to a discovery request of **identifying [either by location, number, or other mechanism,] all the video/surveillance cameras that point to any part of where the INCIDENT for discovery purposes**. However, California Code of Civil Procedure §2017.010 provides