

SECTION H | INTERROGATORIES

1. In responding to interrogatories whose meaning is unclear, receiving counsel should attempt to discuss the meaning with propounding counsel so that the interrogatories can be answered fully, or appropriate objections can be raised.
2. Objections to interrogatories should be based on a good faith belief and not be made for the purpose of withholding relevant information. If an interrogatory is objectionable only in part, the unobjectionable portion should be answered.
3. A lawyer should never use interrogatories for the purpose of harassing or improperly burdening an adversary or to cause the adversary to incur unnecessary expense. Instead the interrogatories should be tailored to be reasonably calculated to lead to the discovery of admissible evidence.
4. In order to accommodate opposing counsel, attorneys should provide opposing counsel with copies of their interrogatories in word.doc or WordPerfect format (or the like) so that their opposing counsel does not need to re-type the interrogatories in their response (if they so choose)

