

**IV.B | OBJECTIONS, PRIVILEGE, AND RESPONSES**

1 - Objections. Absent compelling circumstances, failure to assert objections to an interrogatory within the time for answers constitutes a waiver and will preclude a party from asserting the objection in a response to a motion to compel. All grounds for an objection must be stated with specificity. Specific objections should be matched to specific interrogatories. General or blanket objections should be used only when they apply to every interrogatory. When an answer is narrowed by one or more objections, this fact and the nature of the information withheld should be specified in the response itself.

2 - Assertions of Privilege. Generalized assertions of privilege will be rejected. A claim of privilege must be supported by a statement of particulars sufficient to enable the Court to assess its validity. For a more detailed discussion of the invocation of privilege, see Section V dealing with privilege. The procedures for invoking privilege set forth in Section V also apply to interrogatory answers.

3 - Interrogatory Responses. A party and counsel ordinarily have complied with their obligation to respond to interrogatories if they have:

- (a) Responded to the interrogatories within the time set by the governing rule, stipulation, or court-ordered extension;
- (b) Conducted a reasonable inquiry, including a review of documents likely to have information necessary to respond to interrogatories;
- (c) Objected specifically to objectionable interrogatories;
- (d) Provided responsive answers; and,
- (e) Submitted the answers under oath, signed by the appropriate party representative.