



LALAWLIBRARY

LA Law Library Locations

Main Library:

(Corner of 1st & Hill)
301 W. First Street
Los Angeles, CA 90012
(213) 785-2529

Mon–Fri: 8:30 am – 6:00 pm
Sat: 9:00 am – 5:00 pm



Courthouse Branch Locations:

Long Beach, Torrance

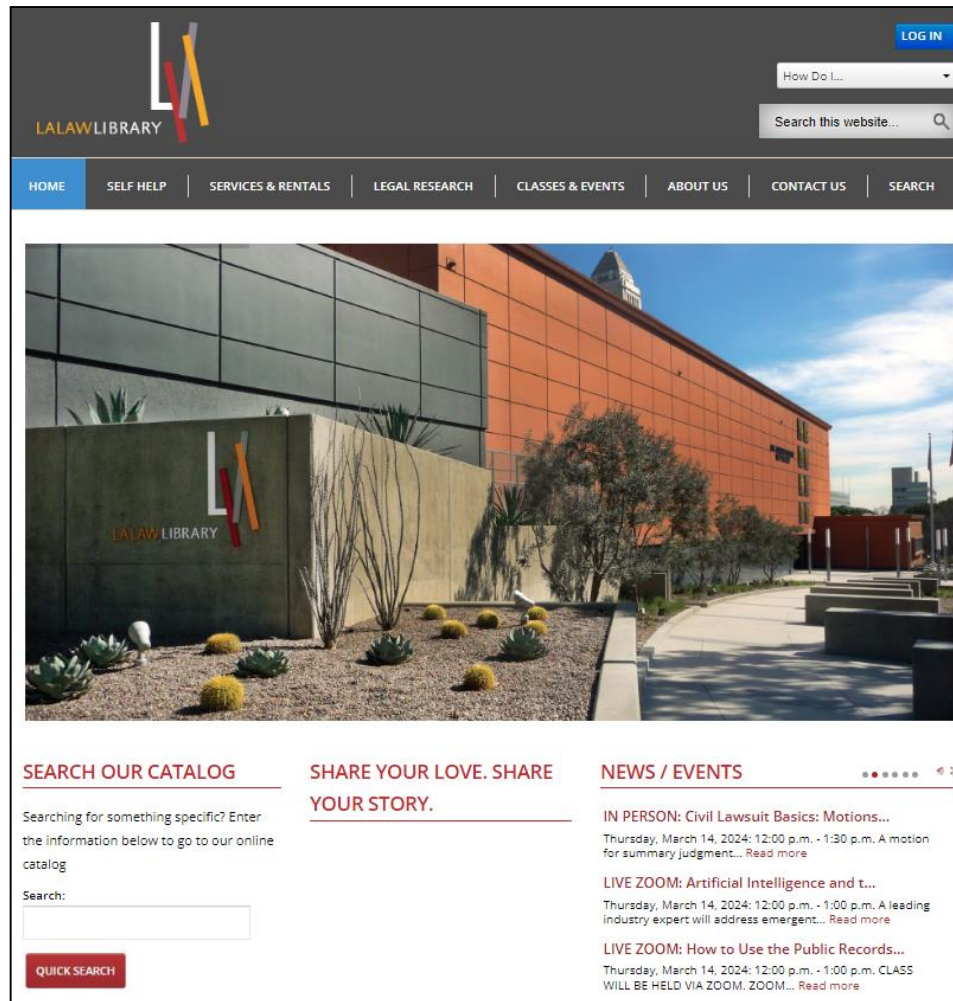
Public Library Partnerships:

Compton, Lancaster, Pasadena, Santa Monica, Van Nuys



LALAWLIBRARY

www.lalawlibrary.org



The screenshot shows the homepage of the Law Library of the University of Texas at Austin. The header features the library's logo, a 'LOG IN' button, a dropdown menu for 'How Do I...', and a search bar. A navigation menu includes links for HOME, SELF HELP, SERVICES & RENTALS, LEGAL RESEARCH, CLASSES & EVENTS, ABOUT US, CONTACT US, and SEARCH. The main content area is dominated by a large photograph of the library's modern building with a courtyard. Below the photo are three columns: 'SEARCH OUR CATALOG' with a search input and 'QUICK SEARCH' button; 'SHARE YOUR LOVE. SHARE YOUR STORY.'; and 'NEWS / EVENTS' with a list of upcoming events including 'IN PERSON: Civil Lawsuit Basics: Motions...', 'LIVE ZOOM: Artificial Intelligence and t...', and 'LIVE ZOOM: How to Use the Public Records...'. A large 'LAW' logo is visible in the bottom right corner of the page.



LALAWLIBRARY

Overview

- The LA Law Library was established in 1891
 - The current building was opened in 1953
 - Largest print collection in a public law library west of the Mississippi River
-
- Seven floors
 - 35 miles of shelving
 - 1,000,000 equivalent volumes including print and digital



Library Collections

Print

- Primary and secondary legal materials for all 50 states, federal and multi-state; foreign and international materials
- Extensive historical collection including early California and state colonial materials
- California and Ninth Circuit Appellate and Supreme Court briefs

Electronic

- 20+ databases that patrons can access on-site, including:
 - **CEB OnLaw**
 - **FastCase**
 - **Gale Legal Forms**
 - **HeinOnline**
 - **Lexis Advance**
 - **Westlaw**
- 2 databases that patrons can access off-site:
 - **Legal Information Reference Center** (digital access to Nolo Press titles)
 - **Lexis Digital Library**



Library Services

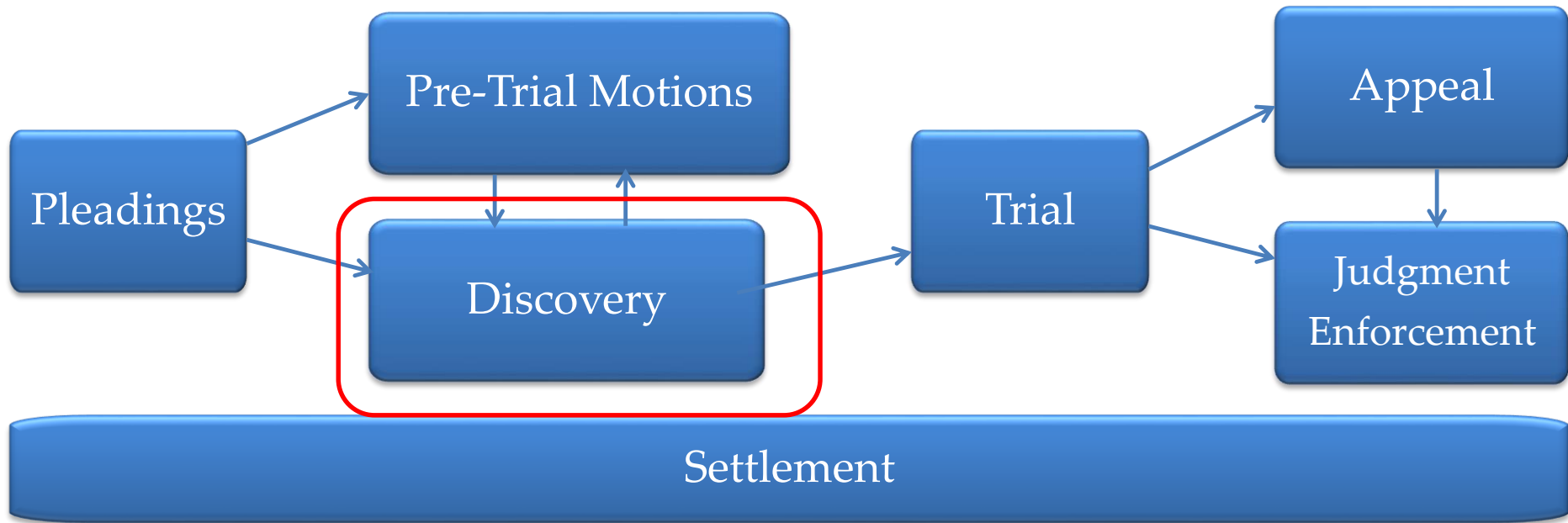
- Reference Service
 - In library, by phone, email, mail and live chat through 24/7 Reference Cooperative
- Document Delivery Service
- Computer Use
- Circulation
 - Borrower registration program
 - Reserve books and more
- Community Connections
- Members Program
 - Designed for attorneys
- Facility Rentals
 - Training Center
 - Conference Rooms
 - Office Space
 - Private Events (up to 500 people)
- Instruction
 - Public training classes
 - MCLE & CIMCE courses
 - Tours



**Civil Lawsuit Basics:
Interrogatories and
Requests for Admission:
Getting Another Party to
Answer Questions in Writing**



Phases of a Civil Lawsuit



*Civil Lawsuit Basics at LA Law Library includes classes on each phase, except appeal (we have separate clinics/classes on civil appeals).



LALAWLIBRARY

Common Formal Discovery Methods

Several discovery methods are available for use in a civil case, depending on what information & documents are needed in the case.

- **REQUESTS FOR ADMISSIONS:** Used to ask another party to admit that certain facts are true, or that certain documents are authentic. Used to simplify a case by eliminating the facts that must be proven at trial.
- **INTERROGATORIES:** Used to ask who, what, where, when and why questions, which the opposing party must answer in writing under oath.
- **DEPOSITIONS:** A witness's or party's oral statement taken under oath.
- **REQUESTS FOR PRODUCTION (RFPs) OR INSPECTION:** Used to inspect and copy documents or tangible items held by the other party.

This class will focus on **REQUESTS FOR ADMISSIONS** and **INTERROGATORIES**.



Disclaimers!

LA Law Library does not provide legal advice. LA Law Library provides legal resources and assistance with legal research as an educational service. The information presented in this program is not legal advice and is provided solely as an educational service to our patrons. For legal advice, you should consult an attorney.

Also, this class is limited to general civil cases in the state courts of California.



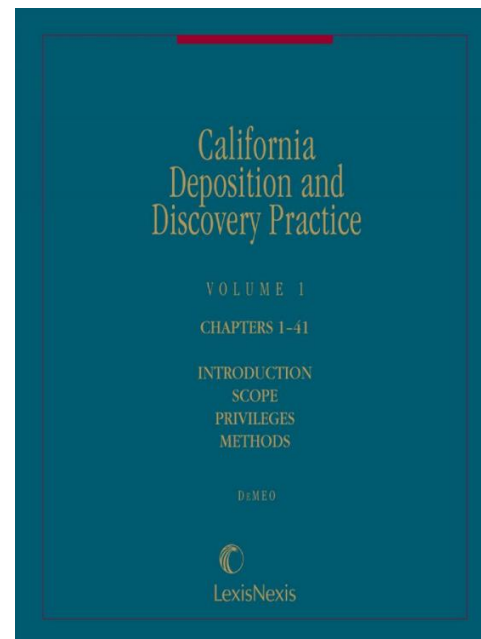
Law Library Resources

- *California Deposition & Discovery Practice*

J.N. DeMeo, KFC1020 D433

Borrow an e-copy & read at home with LALL library card via *LexisNexis Digital Library* database

- Chap. 60 Interrogatories
- Chap. 63 Requests for Admission



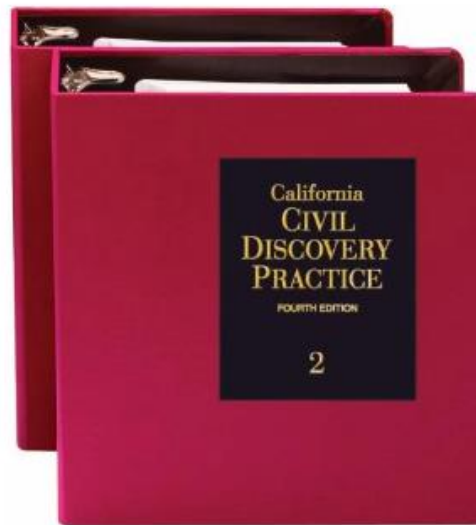
Law Library Resources

- *California Practice Guide: Civil Procedure Before Trial* (Rutter Group)
Weil & Brown, KFC1020 A6W45 1983
 - Chapter 8 Discovery
 - 8F = Interrogatories
 - 8G = Request for Admission



Law Library Resources

- *California Civil Discovery Practice*
Mitchel Abbott et al., KFC1020 C3 2006
 - Chap. 7 Interrogatories
 - Chap. 9 Requests for Admission



Law Library Resources

- *Civil proceedings – Discovery*

California Judges Benchbook, KFC1020 C336 2022

- Chapter 18 Interrogatories

- Chapter 22 Request for Admission

- *Litigation by the Numbers*

Julie A. Goren, KFC995 A65G67 2003

- Chapter 5 Discovery

- sec. 5.4 = Interrogatories

- sec. 5.5 = Request for Admission



Interrogatories

An interrogatory (“rog” for short) is a written question asked by one party to another party, who must answer under oath and in writing. The answer may be used in evidence against the answering party.



Requests for Admissions

A request for admission (RFA) allows one party to force another to admit or deny the truth of any relevant fact or the genuineness of any relevant document.



Rogs – Why?

Obtain information from opposing party:

- What evidence do they have?
- Know what you are up against.
- Limit them later.
- Force them to provide information to help your case (rare).



Rogs – Why?

- **Broader than deposition:** Other party must provide information “available” to the party including from *opposing counsel* or any other agent or employee. Depositions reach only the deponent's personal knowledge.
- **Inexpensive:** Less costly than depositions
- **Less preparation:** less time to draft and serve than to prepare for and take a deposition



Rogs – Why?

- **Obtaining details:** Can obtain exact dates, times and places; account numbers; exact costs; names. Depositions aren't good for that.
- **Obtaining adversary's contentions:** Can ascertain opinions and contentions of the opposing party



Rogs – Why?

- **Setting up other discovery:** Find other evidence - witnesses, documents or physical evidence, prepare for deposition.
- **Following up after other discovery:** can be used to update older information; follow up on questions not completely answered at depositions; pursue leads obtained through other discovery; get answers after deposition has been completed



Rogs – Why not?

- **Slow:** usually at least a 30–day wait between the time the questions are served and the answers are received; often, much longer.
- **More coaching:** Answers are often prepared by counsel, so you won't get spontaneous answers or admissions
- **Not good for broad questions:** no chance for immediate follow-up questions; vague answers are difficult to clarify.
- **Can be sent to parties only:** Only depositions can compel nonparties to give information



Rogs – Who?

May be sent to “*any other party*” to the action (Code Civ. Proc., § 2030.010, subd. (a)).

- Cannot send to non-parties

Corporations, partnerships, etc: must be directed to the *entity* itself not to an officer, director or employee

- cannot designate who will answer
- Entity must provide information known to *any* of its officers or agents.



Rogs – Who?

My son and I are being sued by my credit card company for the unpaid balance on my account from my purchase of my son's car. We cross-complained against the dealership that sold me the car because it was a lemon.

Can I send rogs to:

My credit card company?

The bank that finances my credit card company?

The car dealership?

The manager of the dealership who told me the car was in perfect condition?

My son?



Rogs – How?

- Can propound both form & special rogs
- Need not be all at once



Rogs – How? Forms

Official Form Interrogatories:

Available here or on Judicial Council website:

- General (DISC-001) -- primarily for use in personal injury and contract actions
- Employment Law (DISC-002)
- Unlawful Detainer (DISC-003/UD-106)
- Limited Civil Cases (Economic Litigation) (DISC-004)
- Family Law (FL-145)
- <https://www.courts.ca.gov/forms.htm>



Rogs – How? Forms

- Advantage: Judge is not likely to sustain an objection as to their *form*.
- Can object as to content: relevance, privilege
- TIP: Form DISC-001 Interrogatory 15.1: “Identify each denial of a *material* allegation . . . in your pleadings (and state facts upon which you base the denial).”



Rogs – How? Special

Each party also has the right to propound 35 “specially prepared” interrogatories to every other party (Code Civ. Proc., § 2030.030, subd. (a)(1)).



Rogs – How? Special

- **Numbering questions:**
Each *interrogatory* (question) within the set must be identified by number or letter (Code Civ. Proc., § 2030.060, subd. (c)).
- No need to provide room for answers
- TIP: Numbering questions consecutively helps keep track.



Rogs – How? Special

- **No subparts:** Specially prepared interrogatories may not contain subparts (Code Civ. Proc., § 2030.060, subd. (f)).
- **Each question separate and complete:** Each interrogatory must be “separately set forth” and “full and *complete in and of itself*” (Code Civ. Proc., § 2030.060, subds. (c)-(d)).
- **No preface or instructions allowed** (Code Civ. Proc., §§ 2030.060, subd. (d), 2033.710).
- **Defined terms:** Terms used in interrogatories may be given special definitions. The defined terms must be typed in *capital letters* every time they are used (Code Civ. Proc., § 2030.060, subd. (e)).



Rogs – How? Special

Prohibitions:

- Unless Official Form Interrogatory, no “**compound, conjunctive or disjunctive**” questions (Code Civ. Proc., § 2030.060, subd. (f)).
- **No incorporation of other materials.** Must be able to understand without resort to other materials in order to answer the question (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164).



Rogs – How? Special

Common Uses:

Exploring Other Party's Contentions: ask a party to state his or her contentions or the facts, witnesses or writings upon which the contentions are based (Code Civ. Proc., § 2030.010, subd. (b)).

- “Do you contend that...”
- “State all facts upon which you base your contention in paragraph 12 of the complaint that...”



Rogs – How? Special

Identification of documents or evidence: find out what documents, records or other physical evidence exists, where it is located, etc.

- “Identify all documents relating to the 2018 sale of the house at 123 Elm St.”
- “State the names of all persons with possession, custody or control of records pertaining to the 2018 sale of the house at 123 Elm.”



Rogs – How many?

- No limit on number of form rogs (Code Civ. Proc., § 2030.030, subd. (a)(2)).
- **Rule of 35:** Limited to 35 “specially prepared” interrogatories to each other party (Code Civ. Proc., § 2030.030, subd. (a)(1)).
- Extras (36+) need not be answered; subparts each count (Code Civ. Proc., § 2030.030, subd. (c)).



Rogs – How many?

The “Rule of 35” *not* an absolute limit.

Also permissible:

- “supplemental” rogs to update earlier answers (Code Civ. Proc., § 2030.070, subd. (a)); or
- attach “declaration of necessity” (Code Civ. Proc., §§ 2030.040, subd. (a), 2030.050); or
- written stipulation (Code Civ. Proc., § 2016.030).



Rogs – How many?

“Declaration of necessity”:

- The Civil Code provides a form for your declaration (Code Civ. Proc., § 2030.050).
- You must state why more than 35 is warranted.

For example:

- because of the complexity or quantity of issues;
- the financial burden entailed in discovering the information by oral deposition;
- or because it is more expedient for the other party) (Code Civ. Proc., § 2030.040.)



Rogs – Responding

Unless excused by a protective order, must respond to each question *separately, under oath*, and within the *time limits* (Code Civ. Proc., § 2030.210, subd. (a)).

Response may be:

- An *answer*;
- An *objection*; or
- An *election to allow inspection and copying of records*, i.e., an exercise of the party's option to produce documents instead (Code Civ. Proc., § 2030.210, subd. (a)).



Rogs – Time to Respond

- Response is due *within 30 days* from the date the *interrogatories were served* (Code Civ. Proc., §§ 2030.260, subd. (a), 2016.050).
- Extended for service by mail, overnight, fax or electronic delivery (Code Civ. Proc., §§ 1010.6, subd. (a)(4), 1013).
- If deadline is weekend or holiday, extends to next court day closer to the trial date (Code Civ. Proc., § 2016.060).



Rogs – Time to Respond

Delay WAIVES objections:

Failure to respond within the time limit waives most objections, including privilege and “work product” protection!
(Code Civ. Proc., § 2030.290, subd. (a))



Rogs – Time to Respond

- **Court may shorten or extend time** (Code Civ. Proc., § 2030.260, subd. (a)). **Noticed motion required.**
- Parties may stipulate to extend time to respond to interrogatories (Code Civ. Proc., § 2030.270).
 - Agreement must “be confirmed in a writing that specifies the extended date for service of a response” (Code Civ. Proc., § 2030.270, subd. (b)).
 - Stipulation extending the time to “respond” applies to objections as well as answers (Code Civ. Proc., § 2030.270, subd. (c)).



Rogs – Answering

- Must be “*as complete and straightforward*” as the information reasonably available to the responding party permits. If an interrogatory cannot be answered completely, it shall be answered to the extent possible” (Code Civ. Proc., § 2030.220, subds. (a)-(b)).
- Cannot reference other documents or answers; must answer each question (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164).
- Must make *reasonable and good faith effort* to obtain the information unless equally available to the propounding party (Code Civ. Proc., § 2030.220, subd. (c)).
- Evasive response is grounds for sanctions (Code Civ. Proc., § 2030.300).



Rogs – Objecting

- Instead of answering, may serve objections (Code Civ. Proc., § 2030.210, subd. (a)(3)).
- Each objection must be stated *separately* (no objections to entire set), and must bear the same number or letter as the interrogatory to which it is directed (Code Civ. Proc., § 2030.210, subd. (a)).
- Alternative to protective order
- TIP: Don't object to form (e.g., opinion, hearsay, assumes facts not in evidence, ambiguous). Courts don't like these and discovery is broad.



Rogs – Objecting

Possible, proper objections:

- Privilege, work product, or right of privacy
- Exceeds permissible scope of discovery; “not relevant to the subject matter of the action”
- More than 35 special rogs without required declaration
- Question not “full and complete in and of itself”;
- Seeks content or production of documents (not a proper purpose)
- Seeks information equally available to interrogating party
- Is “burdensome and oppressive”

Failure to object is a waiver.



Rogs – Inspection as Alternative Response

Instead of answering, may allow the party asking to inspect and copy records if can show:

- *A compilation, abstract, audit or summary of the responding party's records is necessary in order to answer the interrogatory; and*
- *No such compilation, etc. presently exists; and*
- *The burden or expense of preparing or making it would be substantially the same for both parties (Code Civ. Proc., § 2030.230).*



Rogs – Inspection as Alternative Response

To utilize this option, the response must:

- Be *timely* (delay waives the right to exercise the option (Code Civ. Proc., § 2030.290, subd. (a))).
- *Refer* to Code of Civil Procedure section 2030.230; and
- *Specify* the documents from which the answer can be derived.



Rogs – Enforcement

Motion to Compel Responses or Further Responses

Can seek monetary sanctions; court has limited authority to deny monetary sanctions

Sanctions for Failure to Obey Court Order

Monetary; Compelled Answers; Exclusion at Trial; Issue Sanction; Contempt



Rogs – Using the Responses

As substantive evidence:

- Use is subject to rules of evidence
- Ok even if party is present or will testify
- May be used by *any* party
- Admissible against responding party only
- Not conclusive; answering party may rebut or explain
- TIP: Very useful for motions
- See Evidence Code



Rogs – Using the Responses

- **Impeachment:** If offer different testimony (Evid. Code, § 780, subd. (g))
- **Deem answer binding or exclude inconsistent evidence:**
If:
 1. answers were *willfully* false
 2. the opposing party relied upon them to its prejudice, and
 3. the prejudice *cannot be cured* by a continuance or by using the answers for impeachment.
- (See Code Civ. Proc., § 2030.310, subds. (b)-(c); *Thoren v. Johnston & Washer* (1972) 29 Cal.App.3d 270, 274)



RFAs – Why?

Primarily:

- Find out what facts are in dispute
- Limit discovery and evidence at trial
- Support motions

Secondarily: Discover evidence



RFAs – Why?

- **Setting up other discovery:** Find what's in dispute; decide what evidence you need.
- **BINDING:** Answers to rogs and deposition questions can be changed or explained. RFAs are *conclusive* and can only be changed with court permission (Code Civ. Proc., § 2033.410, subd. (b)).
- **Following up after other discovery:** Confirm admissions made at deposition or in responses to rogs so they can't be changed



RFAs – Why?

- **Chance for immediate win:** If opponent admits key facts, can move for a summary judgment
- **Cost-of-proof sanctions:** If opponent refuses to admit and you prove it at trial, you may be entitled to the expense of proving it.



RFAs – Why not?

- **Coaching:** Not spontaneous
- **Can be sent to parties only:** Only depositions can compel nonparties to give information
- **Limited number:** Like interrogatories, RFAs are subject to the “Rule of 35 plus”
- **Equivocal denials and stalling:** An equivocal denial requires a court order to clarify



RFAs – Who?

Same as rogs:

- May be sent to “*any other party*” to the action (Code Civ. Proc., § 2033.010).
- Cannot send to non-parties



RFAs – How? Form

- Official Form RFAs not tailored to any particular type of action. Just a shell.
- Advantage: judge is less likely to sustain an objection as to their *form*.
- *Can object as to content: relevance, privilege*



RFAs – How? Special

- RFAs must be in a *separate document*, not combined with interrogatories or other discovery (Code Civ. Proc., § 2033.060, subd. (h)).
- **Numbering questions:** Each *RFA* must be identified by number or letter (Code Civ. Proc., § 2033.060, subd. (c)).
- **No need to provide room for answers**



RFA – How? Special

Same as rogs:

- No subparts
- Each question separate and complete
- No preface or instructions allowed
- Defined terms in CAPS

If RFA is re: genuineness of document, then original document must be available for inspection (Code Civ. Proc., § 2033.060, subd. (g)).



RFAs – How? Content – Special

Common Uses:

Admit verifiable facts

Admit that YOU were driving 60 mph northbound on Elm St at the time of the ACCIDENT.

Admit that EMPLOYEE never received a rating of less than “outstanding” in any written performance evaluation while in YOUR employ.

Discover opinions (not permissible in depositions of percipient witnesses)

Admit that the value of the vehicle you were driving was less than \$2,000.



RFAs – How? Special

Common Uses:

Genuineness of Documents

Admit that the Exhibit A is a true and correct copy of the agreement referred to in Paragraph 14 of your Complaint.

Legal Conclusions

Admit that YOU were acting within the course and scope of your employment when you telephoned PLAINTIFF on January 12, 2010.



RFAs – How many?

- No limit on RFAs re: genuineness of documents (Code Civ. Proc., § 2033.030, subd. (c)).
- Same Rule of 35 as rogs (Code Civ. Proc., § 2033.030, subd. (a)).
- Unlike rogs, form RFAs do count towards 35 (Code Civ. Proc., §§ 2033.030, 2030.050).



RFAs – How many?

- Additional RFAs are permissible:
 - By attaching a “declaration of necessity” (Code Civ. Proc., §§ 2033.030, subd. (b)); or
 - By written stipulation (Code Civ. Proc., § 2016.030).
- **Again, limited civil cases:** limited to 35 total for *all* discovery requests—interrogatories, RFAs and inspection demands combined (Code Civ. Proc., §§ 94–95).



RFAs – Responding

- Unless excused by a protective order, must respond to each question *separately, under oath*, and within the *time limits*.
- Response must be:
 - An *answer (admit or deny)*;
 - An *objection*; or
 - A statement of inability to admit or deny
- (See Code Civ. Proc., §§ 2033.210–2033.250.)



RFAs – Time to Respond

- Response due *within 30 days* from date of service (within 5 days if unlawful detainer action) (Code Civ. Proc., §§ 2033.250,2016.050)
- Extended for service by mail, overnight delivery, fax or electronically per (Code Civ. Proc., §§ 1010.6, subd. (a)(4), 1013).
- If the last day falls on a weekend or holiday, the time limit is extended to the next court day closer to the trial date (Code Civ. Proc., § 2016.060).



RFAs – Time to Respond

- **Court may shorten or extend time** (Code Civ. Proc., § 2033.250, subd. (a)). **Noticed motion required.**
- Parties may stipulate to extend time to respond to RFAs (Code Civ. Proc., § 2033.260).
 - Agreement must “be confirmed in a writing that specifies the extended date for service of a response” (Code Civ. Proc., § 2033.260, subd. (b)).
 - Stipulation extending the time to “respond” applies to objections as well as answers (Code Civ. Proc., § 2033.260, subd. (c)).



RFAs – Answering

Answer must be “as complete and straightforward” as the available information *reasonably permits* and must “(a) admit so much of the matter involved in the request as is true . . . or *as reasonably and clearly qualified* by the responding party” (Code Civ. Proc., §§ 2033.220, subd. (a), 2033.220 subd. (b)(1)).

Can qualify an admission: “Admit, except the car was blue.”



RFAs – Inability

- Instead of admitting or denying, may claim *inability* (lack of sufficient information) to admit or deny.
- Must also state that *a reasonable inquiry was made* to obtain sufficient information
- (See Code Civ. Proc., § 2033.220, subd. (c).)



RFAs – Objecting

- Instead of answering, may object. Same objections as rogs.
- Cheaper, easier alternative than protective order



RFAs – Enforcing

- **If no responses, can move for “deemed admitted order”** (Code Civ. Proc., § 2033.290, subd. (e)).
 - motion defeated by late responses
 - otherwise motion “shall be granted”
 - monetary sanctions mandatory
- **If responses incomplete or improper, can move to compel further answers** (Code Civ. Proc., § 2033.290, subd. (a)).



RFAs – Enforcing

- Failure to timely respond results in **waiver of all objections** to the requests—even privilege or work product protection (Code Civ. Proc., § 2033.280, subd. (a)).
- Relief from waiver may be granted if the court finds:
 - party's failure to serve a timely response resulted from “mistake, inadvertence or excusable neglect”; and
 - party has *subsequently served a response* in “substantial compliance” (Code Civ. Proc., § 2033.280).
- Must move for relief before court issues “deemed admitted” order (Code Civ. Proc., § 2033.280, subd. (b))



RFAs - Amend or Withdraw

An admission cannot be amended or withdrawn except by leave of court after noticed motion (Code Civ. Proc., § 2033.300, subd. (a)).

Policy favors allowing withdrawal of admissions



RFAs – Using the Responses

As substantive evidence:

- Matter admitted is conclusively established; no contrary evidence is admissible
- Use is still subject to rules of evidence (relevance, ambiguity, etc)
- May be used by any party
- Admissible against responding party only and only in same proceeding; hearsay as to others
- See Evidence Code



Rogs & RFAs – When? Limits

“Hold” at outset of case: Plaintiff may not serve rogs or RFAs on defendant within *first 10 days* after service of summons or defendant's appearance (whichever is first) (Code Civ. Proc., § 2030.020, subds. (b),(d)).

Hold applies only to plaintiff; defendant can serve during this period (Code Civ. Proc., § 2030.020, subd. (a)).



Rogs & RFAs – When? Limits

- Unless otherwise ordered:
 - discovery must be *completed 30 days* before the initial trial date; *and*
 - discovery motions must be heard no later than *15 days* before trial (Code Civ. Proc., § 2024.020, subd. (a)).
- “**Completed**” means the day the *response* is due (Code Civ. Proc., § 2024.010).



Rogs & RFAs – When? Tips

- **Last possible minute:** serve so that the responses are due 30 days before the first trial date.
 - What's the problem with this?*
- **Better plan:** serve at least 90 days before trial so that the response is due no later than 60 days before trial (not just 30).
 - Caution:* Still may not be sufficient.
 - Why?*



Rogs & RFAs – When? Quirks

- **Continuance of trial does not reopen discovery:** Cut-offs measured from the *first* trial date. Continuance of the trial date does *not* by itself reopen discovery (Code Civ. Proc., § 2024.020, subd. (b)).
- **Parties may agree to later deadline:** (Code Civ. Proc., § 2024.060) (called a stipulation)
- **Court may grant leave for later RFAs or interrogatories:** (Code Civ. Proc., § 2024.050) (requires a motion – on court's own motion)



Rogs & RFAs – Service

Service: Copies must be served on the party being asked to answer and on all other parties who have appeared in the action (Code Civ. Proc., § 2033.060, subd. (h)).

Not filed with court: The propounding party retains the original. They are *not* filed with the court.



Rogs & RFAs – Format

- Below title of the case must show: identity of responding party; identity of propounding party; and set number (Code Civ. Proc., § 2030.210, subd. (b)).
 - Example:** “PLAINTIFF JOHN SMITH'S SECOND SET OF INTERROGATORIES TO DEFENDANT JANE BROWN”
 - Example:** “DEFENDANT JANE BROWN’S RESPONSE TO PLAINTIFF JOHN SMITH'S SECOND SET OF REQUESTS FOR ADMISSIONS ”
- Each **response** must be in same order and identified by same number or letter as rog being answered (Code Civ. Proc., § 2030.210, subd. (c)).



Rogs & RFAs – Format

RESPONSES: Do not need to repeat the text of the question in the response (Code Civ. Proc., §§ 2030.210, subd. (d)).

Responses must be signed under oath by the party responding. If they contain an objection, the *attorney* must also sign the response; and if *entirely* objections, only the attorney's signature is required (Code Civ. Proc., §§ 2030.250, subds. (a),(c)).



MORE about interrogatories & RFAs covered in Law Library resources...

- *California Deposition & Discovery Practice* (Lexis)
- *California Practice Guide: Civil Procedure Before Trial* (Thomson Reuters/Westlaw)
- *California Civil Discovery Practice* (CEB)
- *Civil proceedings – Discovery*
- *Litigation by the Numbers*

[See slides 11-14 for details]



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Thank you!

For informational questions about the law,
about lawyer referral services,
and additional resources, contact our

LA Law Library Reference Desk

reference@lalawlibrary.org

Phone: 213-785-2513



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