

Infliction of Emotional Injury.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean the facts involved in the combined events and incidents which allegedly caused injury or damage to the plaintiff as a result of any infliction of emotional distress on the plaintiff by the defendant.

As used herein "Acts of Cruelty" shall include continuous use of offensive language against other spouse (as course of conduct) in front of third party or children. The effect of gross and abusive language depends on degree of sensitiveness and refinement of person to whom addressed.

1. As of the time of the alleged occurrence, please describe the defendant's knowledge of the plaintiff's sensitivity, impairment, feelings and attitudes regarding the subject of any emotional injury, stating the defendant's knowledge of the plaintiff's:
 - a. Moral beliefs,
 - b. Religious beliefs,
 - c. Physical condition,
 - d. Mental condition, and
 - e. Membership in a class of persons usually thought to be susceptible to emotional distress.
2. Is it the defendant's contention, allegation or belief that the plaintiff as an individual or due to any unusual conditions at the time of the alleged occurrence was particularly susceptible to emotional distress?
3. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief.
4. If, at the time of the alleged occurrence, the plaintiff had any particular sensitivity, impairment, feelings or attitude regarding the subject of any emotional injury, please describe how the defendant gained knowledge or learned of the plaintiff's sensitivity, impairment, feelings or attitudes, indicating:
 - a. A description of each sensitivity,
 - b. A description of each impairment,
 - c. A description of each feeling,
 - d. A description of each attitude,
 - e. Whether and how the defendant gained such knowledge by the plaintiff informing the defendant,
 - f. Whether and how the defendant gained such knowledge by observing the plaintiff,
 - g. Whether and how the defendant gained such knowledge by a third party informing the defendant, and if so, give the name and address of each such third party, and
 - h. Whether the defendant gained such knowledge from some other source or in some other way.
5. Please describe in full detail how the alleged occurrence took place, giving all events in detail in the order in which they occurred, before, at the time of, or after the occurrence, which had any bearing on the cause and manner of the happening of the occurrence.

6. Please state in complete detail as to each alleged incident:
 - a. The date and time of each incident,
 - b. The place of each incident,
 - c. The physical description of the place where each incident occurred,
 - d. All the reasons known to you for which the plaintiff was present in each such place,
 - e. All the reasons for which the defendant was present in each such place, and
 - f. The physical appearance of the defendant.
7. Please describe in detail what relationship, if any, existed between the plaintiff and the defendant as of the time of the alleged occurrence, giving details as to:
 - a. The date and manner in which the relationship began,
 - b. The purpose of the relationship, and
 - c. The duration of the relationship.
8. Please attach a copy of all written records which pertain to the answers to the preceding interrogatory or indicate where and when such records may be examined by counsel.
9. Please describe in detail all actions of the defendant to enforce or fulfill the obligations of such relationship between the plaintiff and the defendant.
10. Please describe in detail all relationships, if any, which existed between the plaintiff and the defendant within five years prior to the time of the first alleged incident, giving details as to:
 - a. The date and manner in which the relationship(s) began,
 - b. The purpose of the relationship(s),
 - c. The duration of the relationship(s), and
 - d. The manner in which the relationship(s) was ended.
11. Please attach a copy of all written records which pertain to the answers to the preceding interrogatory or indicate where and when such records may be examined by counsel.
12. Please describe in detail all actions of the defendant to enforce or fulfill the obligations of each such relationship.
13. Please describe everything which the defendant did in an attempt to avoid any injury or damage just prior to or at the time of each such alleged incident.
14. Please describe in detail the relationship, if any, between:
 - a. The plaintiff and defendant,
 - b. The plaintiff and each injured person,
 - c. Each injured person and the defendant,
 - d. The plaintiff and each witness,
 - e. The defendant and each witness, and
 - f. Each injured person and each witness.
15. For each relationship specified in the preceding interrogatory, please set forth:
 - a. How the relationship commenced,
 - b. The duration of the relationship,

- c. The frequency of communication between each person prior to the alleged occurrence, and
 - d. The frequency of communication between each person after the alleged occurrence.
16. Please identify and describe the appearance of each and every person who was present at the time of each such incident, including in your answer:
 - a. The name and address of each such person if known to you,
 - b. The date(s) on which each such person was present,
 - c. The location of each such person in reference to the plaintiff and the defendant during the time of each such incident,
 - d. The reason(s) for each such person being present at the time and place, and
 - e. The relationship, if any, which exists or existed between each such person and the defendant.
17. Please describe fully each and every source of knowledge about the alleged occurrence of which you are aware, including:
 - a. The identification of each such source,
 - b. The date and time you received any information from each such source regarding the alleged occurrence,
 - c. The substance of all such information you received from each such source, and
 - d. The manner in which such information was received.
18. Did any person known to the defendant witness any incident or part thereof of the alleged occurrence?
19. If the answer to the preceding interrogatory is in the affirmative, please state as to each such witness:
 - a. The name and address,
 - b. The occupation and employer,
 - c. The time of day when the occurrence or an incident happened during which the witness was present,
 - d. The location of the witness in relation to fixed objects or boundaries at the time of the alleged occurrence,
 - e. The location of the witness in relation to the plaintiff, each injured person and the defendant,
 - f. The reason, if known, the witness was present during the alleged occurrence,
 - g. Age and physical appearance, and
 - h. The clothing worn by witness.
20. Please give the substance of any and all conversations, communications or statements made by or between the plaintiff and the defendant relative to the alleged occurrence.
21. If the answer to the preceding interrogatory is in the affirmative, please state:
 - a. The identification, including name and address, of each such person,
 - b. The date of each such statement,
 - c. The substance, as best you can give it, of each such statement, and

- d. If such statement was in writing, either attached a copy hereto, or indicate where and when such statement maybe examined by counsel.
22. Please state, whether prior to any alleged incident, the defendant knew of or was aware of any sensitivity or susceptibility of the plaintiff.
23. If the answer to the preceding interrogatory is in the affirmative, please give a full and complete description of:
- The substance of such knowledge,
 - The date and manner in which such knowledge was gained,
 - The source of such knowledge, and
 - What actions, if any, the defendant took in response to it.
24. Did the defendant, prior to the time of any of the alleged incidents or after the time of the first alleged incident, receive or become aware of any complaint in reference to any contact or communication between the plaintiff and the defendant?
25. If the answer to the preceding interrogatory is in the affirmative, please describe:
- The date on which the complaint was received,
 - The substance of the complaint,
 - The identity of the person who made the complaint,
 - The manner in which the complaint was received, and
 - All actions taken in response to such complaint.
26. Please describe in detail as to each alleged incident the plaintiff's emotional or mental condition when the defendant had initial contact with the plaintiff, during the incident, and when the incident ended.
27. Did the plaintiff seem distressed, upset, nervous, shocked, frightened, fearful, humiliated, insulted, angered, or outraged at any time during each alleged incident?
28. If the answer to the preceding interrogatory is in the affirmative, please describe:
- The exact nature of the plaintiff's mental or emotional state, including the physical manifestations,
 - The time and manner in which the defendant realized that the plaintiff was becoming so affected,
 - All actions taken by the defendant upon gaining such knowledge, and
 - Whether the encounter or contact ended because of this reaction by the plaintiff.
29. Please describe fully all the actions of the defendant during each alleged incident.
30. Please describe fully as to each alleged incident:
- All physical contact between the plaintiff and the defendant,
 - The words of the defendant,
 - The gestures of the defendant,
 - The tone of voice of the defendant, and
 - Whether the encounter with the plaintiff was planned or otherwise.

31. If the exact words cannot be remembered, please give the substance of each conversation or communication with the plaintiff during each alleged incident, indicating whether the defendant swore, threatened violence, made accusations of dishonesty or illegal or immoral behavior, threatened legal proceedings, threatened to reveal information to the plaintiff's employer or neighbors, or spoke in any other abusive or insulting manner.
32. Please describe fully as to each alleged incident the conduct, conversation and actions of the plaintiff.
33. Did the plaintiff communicate orally with the defendant just prior to, at the time of, or just after the alleged occurrence?
34. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such conversation:
 - a. The identity of each participant in the conversation,
 - b. The time the conversation took place,
 - c. The substance of the conversation, and
 - d. All persons present at the time of the communication.
35. Did the plaintiff communicate orally with any injured person just prior to, at the time of, or just after the alleged occurrence?
36. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such conversation:
 - a. The identity of each participant in the conversation,
 - b. The time the conversation took place,
 - c. The substance of the conversation, and
 - d. All persons present at the time of the communication.
37. Did the defendant communicate orally with any person witnessing the alleged occurrence or any part thereof, just prior to, at the time of or just after the alleged occurrence?
38. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such conversation:
 - a. The identity of each participant in the conversation,
 - b. The time the conversation took place,
 - c. The substance of the conversation, and
 - d. All persons present at the time of the communication.
39. Prior to the alleged occurrence, did the defendant have knowledge of any weakness, prior illness or predisposition to emotional distress that would cause the plaintiff to be susceptible to emotional distress or discomfort or its physical manifestations?
40. If the answer to the preceding interrogatory is in the affirmative, please set forth in detail all facts of which the defendant had knowledge prior to the alleged occurrence pertaining to the plaintiff's susceptibility to emotional distress and/or its physical manifestations.
41. What was the plaintiff doing just prior to, at the time of, and just after the alleged occurrence?
42. What was each injured person doing just prior to, at the time of, and just after the alleged occurrence?

43. Please describe fully as to each separate act in which the alleged occurrence, all physical contact between the defendant, or any object or instrumentality controlled thereby, and any other person involved in the alleged occurrence.
44. Please specify the location of the plaintiff to each injured person:
- Immediately prior to the alleged occurrence,
 - The time of the alleged occurrence,
 - Five minutes after the alleged occurrence,
 - Fifteen minutes after the alleged occurrence, and
 - One hour after the alleged occurrence.
45. Please describe all injuries, giving the size, appearance and position of any marks, cuts, bruises or blood, if any, that you saw upon the plaintiff immediately after the alleged occurrence.
46. Please describe in detail any and all conversations, sounds, utterances, speech, noises, acts or movements made by the plaintiff immediately after the alleged occurrence.
47. Please describe in complete detail the appearance of the plaintiff immediately after the alleged occurrence, particularly with regard to the following:
- The physical condition of the plaintiff, that is, whether there were any obvious signs of bleeding, bruises, cuts or the physical injury, and
 - The emotional or mental condition of the plaintiff, that is, whether or not the plaintiff was crying, talking, complaining of pain or otherwise mentally disturbed.
48. Please describe in complete detail everything you observed about the plaintiff, including the appearance of any injuries, immediately after the alleged occurrence.
49. Please state what injuries were observed on the plaintiff's body by you after the alleged occurrence.
50. If, from any observation made by you immediately after the alleged occurrence, the plaintiff appeared to have been injured as a result of such occurrence, please describe in complete detail each such appearance of injury.
51. Did the plaintiff appear distressed, upset, nervous, shocked, frightened, fearful, anxious, hysterical or agitated at any time during the alleged occurrence?
52. If the answer to the preceding interrogatory is in the affirmative, please describe:
- The exact nature of the plaintiff's mental or emotional state, including the physical manifestations,
 - The time and manner in which the defendant or any agent or employee of the defendant realized the plaintiff was so affected, and
 - All actions taken by the defendant or any agent or employee of the defendant upon gaining such knowledge.
53. Immediately after the alleged occurrence, did the defendant observe the plaintiff at or near the scene of the alleged occurrence?

54. If the answer to the preceding interrogatory is in the affirmative, please describe:
- The appearance of the plaintiff after the alleged occurrence,
 - The tone of voice used by the plaintiff after the alleged occurrence, and
 - The emotional condition of the plaintiff after the alleged occurrence.
55. Did the defendant observe the plaintiff speaking or attempting to speak with any injured person immediately after the alleged occurrence?
56. If the answer to the preceding interrogatory is in the affirmative, please state:
- The exact words, if known, spoken by the plaintiff and each injured person,
 - The substance of each communication,
 - The duration of each communication,
 - The identity of all witnesses, if any, to the communication, and
 - The tone of voice used by each participant throughout each communication.
57. Did the defendant observe the plaintiff just subsequent to the alleged occurrence?
58. If the answer to the preceding interrogatory is in the affirmative, please describe in complete detail the appearance of the plaintiff immediately after the alleged occurrence, including:
- The physical condition of the plaintiff, indicating the presence of signs of bleeding, bruises, consciousness, cuts or other physical injury,
 - The emotional or mental condition of the plaintiff indicating whether or not the plaintiff was crying, complaining of pain, talking conscious, etc., and
 - The appearance of the plaintiff's clothing after the occurrence, indicating whether any part of it was disarranged, torn, dirty or otherwise affected by the alleged occurrence.
59. Did the plaintiff have any physical contact with any injured person during or immediately subsequent to the alleged occurrence?
60. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such injured person:
- A description of the physical contact,
 - The identity of the injured person,
 - The physical condition of the injured person at the time of the physical contact,
 - Whether or not the injured person was conscious, and
 - The duration of physical contact.
61. Please identify all persons injured during the alleged occurrence, including in your response for each such injured person the name, address and age.
62. Please describe in complete detail all injuries sustained by each injured person at the time of the alleged occurrence, giving size, appearance and position of any marks, cuts, bruises, wounds or blood, if any, on each injured person that the defendant, his or her agents or employees observed.
63. Please describe in complete detail the appearance of each injured person immediately after the alleged occurrence, including for each such person:

- a. The physical condition of the injured person, indicating the presence of signs of bleeding, bruises, consciousness, cuts or other physical injury,
 - b. The emotional or mental condition of the injured person indicating whether the person was crying, complaining of pain, talkative, unconscious, etc., and
 - c. The appearance of the injured person's clothing after the occurrence, indicating whether any part of it was disarranged, torn, dirty or otherwise affected by the alleged occurrence.
64. Did the defendant render assistance of any kind to the plaintiff after the alleged occurrence?
65. If the answer to the preceding interrogatory is in the affirmative, please set forth:
- a. A precise description of all assistance rendered to the plaintiff, and
 - b. The name and address of each person who rendered assistance to the plaintiff.
66. Did the defendant refer the plaintiff to a doctor or for medical assistance?
67. If the answer to the preceding interrogatory is in the affirmative, please state:
- a. The name and address of each doctor or medical person to whom the plaintiff was referred,
 - b. The name and address of the person who referred the plaintiff for medical assistance, and
 - c. Each reason why that person referred the plaintiff for additional assistance.
68. Did the defendant call for medical assistance for an injured person at the site of the alleged occurrence?
69. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such injured person:
- a. The name and address of each doctor or medical person who was called to treat the injured person,
 - b. The name and address of each doctor or medical person who was called to treat the injured person at the time of the alleged occurrence,
 - c. A description of the medical care rendered, and
 - d. The name and address of the person who called the doctor or medical person to treat the injured person.
70. Please set forth in detail all physical injuries, ailments or pain which the defendant sustained as a result of the alleged occurrence, stating in your answer for each such injured person:
- a. Name and address,
 - b. Each part of the body affected,
 - c. The severity of the injuries,
 - d. The duration of the injury, and
 - e. The size, nature and position of all marks, cuts, bruises or bleeding.
71. Was first aid administered to the defendant at or near the place of the alleged occurrence?

72. If the answer to the preceding interrogatory is in the affirmative, please set forth for each such injured person:
- a. Name and address,
 - b. The name and address, if known, of each person administering first aid,
 - c. A physical description of each person administering first aid, and
 - d. The treatment received by the person.
73. Does the defendant contend that the plaintiff was more sensitive or susceptible to mental distress, fright, nervous shock or anguish than the average person at the time of the alleged occurrence?
74. If the answer to the preceding interrogatory is in the affirmative, please state each and every reason why the plaintiff would be more susceptible to the happening of the alleged occurrence than the average person.
75. Is the contention of the defendant that the plaintiff by any act or omission caused or contributed to the alleged occurrence?
76. If the answer to the preceding interrogatory is in the affirmative, please state the basis of this contention and all facts upon which it is based.
77. Please describe any act or statement by the plaintiff which the defendant contend authorized or incited the alleged incident.
78. Is it the contention of the defendant that any person injured in the alleged occurrence by any act or omission caused or contributed to cause the alleged occurrence?
79. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
80. Is it the contention of the defendant that the plaintiff aggravated or exacerbated plaintiff's injuries by any act or omission?
81. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
82. Is it the contention of the defendant that any person injured in the alleged occurrence aggravated or exacerbated the plaintiff's injuries?
83. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
84. Is it the contention of the defendant that a prior medical condition of the plaintiff caused or contributed to cause the plaintiff's injuries?
85. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.

Transmission of Sexual Disease.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean the facts involved in the combined events and incidents which allegedly caused injury or damage to the plaintiff as a result of the transmission of a sexual disease from the defendant to the plaintiff.

1. Prior to or at the time of the alleged occurrence, did the defendant transmit any sexual disease to the plaintiff?
2. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. A description of the sexual disease,
 - b. The date of each transmission,
 - c. Each reason or explanation for such transmission, and
 - d. The manner or method of each transmission.
3. Prior to or at the time of the alleged occurrence, did the defendant have any sexual disease?
4. If your answer to the preceding interrogatory is in the affirmative, please state whether the defendant was inflicted with or had any of the following sexual diseases:
 - a. Syphilis, indicating whether the first, second or latent stage,
 - b. Gonorrhea,
 - c. Chlamydia trachomatous,
 - d. Genital herpes--simplex virus type 2,
 - e. Genital warts--Human Papilloma Virus (HPV),
 - f. Hepatitis B,
 - g. Pelvic Inflammatory Disease (PID),
 - h. Human Immunodeficiency Virus (HIV),
 - i. Acquired Immune Deficiency Syndrome (AIDS), and
 - j. Other sexual disease.
5. If, at or prior to the alleged occurrence, the defendant was inflicted with or had any of the sexual diseases identified in the defendant's answer to interrogatory number 4, please state:
 - a. The date when the defendant first had each such sexual disease, and
 - b. Each source or possible source of each disease, giving name and address and any relationship to the defendant.
6. Prior to or at the time of the alleged occurrence, was the defendant being medically treated for any of the following sexual diseases:
 - a. Syphilis, indicating whether the first, second or latent stage,
 - b. Gonorrhea,

- c. Chlamydia trachomatous,
- d. Genital herpes — simplex virus type 2,
- e. Genital warts — Human Papilloma Virus (HPV),
- f. Hepatitis B,
- g. Pelvic Inflammatory Disease (PID),
- h. Human Immunodeficiency Virus (HIV),
- i. Acquired Immune Deficiency Syndrome (AIDS), and
- j. Other sexual disease.

7. If, at the time of the alleged occurrence, the defendant was being treated by any drug or medication for any sexual disease listed in the defendant's answer to interrogatory number 6, please state:
 - a. The name of each such drug or medication, including the generic name,
 - b. The type of each such drug or medication,
 - c. The identity, giving name and address of each health care professional who prescribed each such drug or medication, and
 - d. The name and address of the location and custodian of any writings or records of each such drug or medication.
8. Please state as to the time when the defendant first became aware that the defendant was infected with or had any sexual disease identified in the defendant's response to interrogatory number 4:
 - a. The date,
 - b. The source of the defendant's knowledge, giving name and address,
 - c. The defendant's act or conduct in response to the defendant's first knowledge of any such sexual disease,
 - d. Whether the defendant sought and obtained medical treatment,
 - e. Whether the defendant notified the plaintiff,
 - f. Whether the defendant notified any sexual partner, and if so, state the name and address of each,
 - g. Whether the defendant refrained from sexual activity, and if so, for how long,
 - h. Whether the defendant did any act or conduct, describing each, and
 - i. Whether the defendant was involved in any sexual intimacy or sexual intercourse with any person other than the plaintiff within a year prior to the alleged occurrence, and if so, give the name and address of each such person.
9. Within five years prior to the alleged occurrence, had the defendant contracted any sexual disease, including, but without limitation, the following:
 - a. Syphilis, indicating whether the first, second or latent stage,
 - b. Gonorrhea,
 - c. Chlamydia trachomatous,
 - d. Genital herpes — simplex virus type 2,
 - e. Genital warts — Human Papilloma Virus (HPV),
 - f. Hepatitis B,
 - g. Pelvic Inflammatory Disease (PID),
 - h. Human Immunodeficiency Virus (HIV), and

- i. Acquired Immune Deficiency Syndrome (AIDS).
10. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
 - a. The identity, giving name, kind and type, of each disease,
 - b. The date of contraction of each disease,
 - c. The source or possible source of each disease, giving the name and address of each,
 - d. Each health care facility treating the defendant for each disease,
 - e. Each health care professional examining and treating the defendant for each disease,
 - f. A description of each care and treatment received by the defendant for each disease, and
 - g. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
11. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called gonorrhea, including, but without limitation:
 - a. Pus-like urethral discharge,
 - b. Frequent urination,
 - c. Burning during urination,
 - d. Increased discharge,
 - e. Abnormal menstrual bleeding,
 - f. Anorectal discomfort,
 - g. High fever, and
 - h. Arthritis.
12. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
 - a. The identity, giving name, kind and type, of each disease,
 - b. The date of contraction of each disease,
 - c. The source or possible source of each disease, giving the name and address of each,
 - d. Each health care facility treating the defendant for each disease,
 - e. Each health care professional examining and treating the defendant for each disease,
 - f. A description of each care and treatment received by the defendant for each disease, and
 - g. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
13. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called syphilis, including, but without limitation:
 - a. Skin rash, mucous patch or chancre lesion located in the genital area or the mouth area,

- b. Sore throat,
- c. Fever,
- d. Weight loss,
- e. Malaise,
- f. Anorexia,
- g. Headaches,
- h. Tertiary disease of the skin, bones, joints, cardiovascular system or central nervous system, and
- i. Blindness.

14. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:

- a. The identity, giving name, kind and type, of each disease,
- b. The date of contraction of each disease,
- c. The source or possible source of each disease, giving the name and address of each,
- d. Each health care facility treating the defendant for each disease,
- e. Each health care professional examining and treating the defendant for each disease,
- f. A description of each care and treatment received by the defendant for each disease, and
- g. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.

15. At or about the time of the alleged occurrence, did the defendant have any of the signs of symptoms of the sexual disease called genital herpes--herpes simplex type 2, including, but without limitation:

- a. Itching,
- b. Tingling sensations beneath skin,
- c. Difficulty in discharging urine (dysuria),
- d. Vaginal discharge,
- e. Urethral discharge,
- f. Painful blisters,
- g. Genital lesions,
- h. Open sores,
- i. Burning sensation in genitalia,
- j. Pain on urination,
- k. Headaches,
- l. Swollen lymph nodes,
- m. Muscle aches,
- n. Fever,
- o. Overall discomfort,
- p. Infection to fetus during pregnancy or birth,
- q. Infant death,
- r. Extragenital lesions,
- s. Cancer of the cervix, and
- t. Cancer of the vulva.

16. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
- The identity, giving name, kind and type, of each disease,
 - The source or possible source of each disease, giving the name and address of each,
 - Each health care facility treating the defendant for each disease,
 - Each health care professional examining and treating the defendant for each disease,
 - A description of each care and treatment received by the defendant for each disease, and
 - The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
17. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called genital warts--Human Papilloma Virus (HPV), including, but without limitation:
- Hard, fleshy bumps on or around the genital area or other body parts, and
 - Cancer of the cervix, vulva or penis.
18. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
- The identity, giving name, kind and type, of each disease,
 - The source or possible source of each disease, giving the name and address of each,
 - Each health care facility treating the defendant for each disease,
 - Each health care professional examining and treating the defendant for each disease,
 - A description of each care and treatment received by the defendant for each disease, and
 - The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
19. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called hepatitis B virus, including, but without limitation:
- Attack of liver,
 - Flu,
 - Jaundice,
 - Cirrhosis, and
 - Liver cancer.
20. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
- The identity, giving name, kind and type, of each disease,

- b. The source or possible source of each disease, giving the name and address of each,
 - c. Each health care facility treating the defendant for each disease,
 - d. Each health care professional examining and treating the defendant for each disease,
 - e. A description of each care and treatment received by the defendant for each disease, and
 - f. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
21. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called pelvic inflammatory disease (PID)?
22. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
- a. The identity, giving name, kind and type, of each disease,
 - b. The source or possible source of each disease, giving the name and address of each,
 - c. Each health care facility treating the defendant for each disease,
 - d. Each health care professional examining and treating the defendant for each disease,
 - e. A description of each care and treatment received by the defendant for each disease, and
 - f. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
23. At or about the time of the alleged occurrence, did the defendant have any of the signs or symptoms of the sexual disease called Acquired Immune Deficiency (AIDS), including, but without limitation:
- a. Enlarged lymph nodes,
 - b. Swollen neck glands,
 - c. Swollen armpit glands,
 - d. Swollen groin glands,
 - e. Fatigue,
 - f. Loss of appetite,
 - g. Fever,
 - h. Night sweats,
 - i. Diarrhea,
 - j. Weight loss,
 - k. Persistent coughs,
 - l. Skin lesions,
 - m. Opportunistic infections, including:
 - (1) Pneumocystis carinii pneumonia,
 - (2) Kaposi's sarcoma (skin cancer),
 - (3) Cytomegalovirus,
 - (4) Toxoplasmosis, and
 - (5) Herpes simplex.

24. If your answer to the preceding interrogatory is in the affirmative, please state as to each such sexual disease:
- a. The identity, giving name, kind and type, of each disease,
 - b. The source or possible source of each disease, giving the name and address of each,
 - c. Each health care facility treating the defendant for each disease,
 - d. Each health care professional examining and treating the defendant for each disease,
 - e. A description of each care and treatment received by the defendant for each disease, and
 - f. The dates, if any, when the defendant was pronounced cured, completed treatment and was discharged for each such disease.
25. At or about the time of the alleged occurrence, did the defendant undergo or submit to any test for any sexual disease?
26. If your answer to the preceding interrogatory is in the affirmative, please state as to each such test:
- a. Each disease tested for,
 - b. The defendant's signs and symptoms at the time of each test,
 - c. Whether a Tzanck smear was done to test for genital herpes,
 - d. Whether a herpes virus culture was done to test for genital herpes,
 - e. Whether a enzyme-linked immunosorbent assay (ELISA) was done to test for AIDS,
 - f. Whether a Western Blot Test was done to test for AIDS,
 - g. The date of each test,
 - h. The name and address of each health care facility at which each test was done,
 - i. The name and address of each health care practitioner involved in each test,
 - j. The result of each test, and
 - k. The name and address of the location and the custodian of any writings or records of each test.