

Invasion of Privacy.

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 alleged invasion of privacy.

1. Please identify yourself, giving your full name, residence, business address, and occupation.
2. Please give the name, residence, business address and occupation of each person who was on the plaintiff's premises at the time of the alleged occurrence.
3. Please describe fully each 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.
4. If you claim that any other person caused or contributed to cause the alleged occurrence, please state the name and address of each such person and the manner in which each such person caused or contributed to cause the alleged occurrence.
5. Were you on the plaintiff's premises at the time of the alleged occurrence?
6. If the answer to the preceding interrogatory is in the affirmative, please describe fully the reason you were on the plaintiff's premises at such time.
7. Please describe fully the relationship that existed between the plaintiff and the defendant at the time of the alleged occurrence including:
 - a. The date such relationship began,
 - b. The manner in which such relationship began,
 - c. The purpose of such relationship, and
 - d. The duration of such relationship.
8. Please describe fully each communication between the plaintiff, or any representative thereof, and the defendant, concerning the defendant's being on the plaintiff's premises at the time of the alleged occurrence.
9. At any time prior to the alleged occurrence had you considered that being on the plaintiff's premises at the time of the alleged occurrence might constitute an invasion of the plaintiff's privacy?
10. If the answer to the preceding interrogatory is in the affirmative, please describe such consideration fully, including:
 - a. The date of such consideration,
 - b. The substance of such consideration, and
 - c. The name and address of each person involved in such consideration.

11. For each item of information pertaining to the plaintiff which was disclosed by the defendant, please describe fully how each such item was obtained, including:
 - a. The name and address of each person from whom the item was obtained,
 - b. The date on which each such item of information was obtained, and
 - c. The manner in which each such item of information was obtained.
12. For each item of information pertaining to the plaintiff which was disclosed by the defendant, please describe fully the reason for such disclosure.
13. Please describe fully each communication between the plaintiff, or any representative thereof, and the defendant, or any representative thereof, concerning the defendant's disclosure of items of information pertaining to the plaintiff.
14. Please describe the occurrence which the plaintiff alleged to have been an invasion of the plaintiff's privacy.
15. Please describe the reason the defendant did what the plaintiff alleges to have been an invasion of the plaintiff's privacy.
16. Did the defendant believe he was invading the plaintiff's privacy during the alleged occurrence?
17. If the answer to the preceding interrogatory is in the negative, please set forth all facts on which such belief is based.
18. Please describe all public statements made by the defendant which pertained to the plaintiff, including:
 - a. The date of each such statement,
 - b. The manner in which each such statement was made, and
 - c. The substance of each such statement.
19. Please describe the reason the plaintiff made each public statement referred to in response to the preceding interrogatory.
20. Please give the substance of all conversations in which you participated, or of which you are aware, which took place after the alleged occurrence and which concerned the defendant's intrusion of the plaintiff's solitude.
21. Please describe all written statements and reports made by you, or of which you are aware, which concern the defendant's intrusion of the plaintiff's solitude, including:
 - a. The date of each such report and written statement, and
 - b. The substance of each such report and written statement.
22. Please state in complete detail the facts which form the basis for whatever legal relationship the defendant claims existed between the plaintiff and the defendant at the time of the alleged occurrence.
23. Did the defendant have any knowledge that the plaintiff was in a secluded location at the time of the alleged occurrence?
24. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The source of your knowledge, and
 - b. The name and address of each person who witnessed the alleged occurrence or has any knowledge about the alleged occurrence.

25. Did the defendant overhear the plaintiff's private affairs?
26. If your answer to the preceding interrogatory is in the affirmative, please state:
- The method of overhearing,
 - Any mechanical aid used, whether a telephone extension, tapping a private telephone wire, a microphone, or a tape recording,
 - The substance of the information overheard,
 - Each reason for the defendant's overhearing,
 - The name and address of each person who was a witness or has knowledge of the alleged occurrence, and
 - The name and address of the location and the custodian of any writing or record.
27. Did the defendant have any knowledge that the plaintiff was communicating private matters?
28. If your answer to the preceding interrogatory is in the affirmative, please state:
- The source of the defendant's knowledge, and
 - The name and address of the location and custodian of any witness or record.
29. Did the defendant oversee any visual prying into the plaintiff's private affairs?
30. If your answer to the preceding interrogatory is in the affirmative, please state the defendant's method of overseeing, including:
- Looking into the plaintiff's location,
 - Opening private and personal mail,
 - Searching the plaintiff's wallet or purse,
 - Searching the plaintiff's safe,
 - Searching the plaintiff's safe deposit box,
 - Inspecting the plaintiff's private records or accounts, and
 - Repeated, persistent, frequent and highly offensive telephone calls to harass the plaintiff.
31. If the defendant ever saw any visual prying into the plaintiff's private affairs, please state each mechanical aid used, including:
- Binoculars,
 - Photographs,
 - Videotape,
 - Film, and
 - Other.
32. If the defendant oversaw any visual prying into the plaintiff's private affairs, please state each source of information overseen, including:
- Each reason for the defendant's overseeing the plaintiff,
 - The name and address of each person who was a witness or has any knowledge of such overseeing, and
 - The name and address of the location and custodian of any writing or record.

33. Did the defendant have any knowledge that any agent or employee of the defendant was visually observing plaintiff's private matters?
34. If your answer to the preceding interrogatory is in the affirmative, please state:
- The source of your knowledge, and
 - The name and address of each person who was a witness or has any knowledge of any visual observing.
35. At the time of the alleged occurrence, did any third person aid or assist the defendant in intruding upon the plaintiff's seclusion or isolation?
36. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name and address of any such person,
 - Any relation to the defendant,
 - The method of assistance,
 - The substance of assistance,
 - The purpose of the assistance, and
 - The name and address of the location and the custodian of any writing or record.
37. Did any third party assist or aid the defendant in eavesdropping into the plaintiff's conversation?
38. If your answer to the preceding interrogatory is in the affirmative, please state:
- The source of the defendant's knowledge, and
 - The name and address of the location and custodian of any witness or record.
39. Did any third party assist the defendant in visually prying into the plaintiff's private matters?
40. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name and address,
 - Any relation to the defendant,
 - Each method of assistance,
 - The substance of any such assistance, and
 - The name and address of the location and the custodian of any writing or record.
41. Did the defendant publish to any third party any intercepted information?
42. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name and address of each person who was a witness or had any knowledge of any publication,
 - The method of publication,
 - The purpose of publication, and
 - The name and address of the location and the custodian of any writing or record.
43. Is it the defendant's contention, allegation or belief that any interference by the defendant would not be highly offensive to a reasonable person?
44. 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.

45. Is it the defendant's contention, allegation or belief that the defendant had no intent to interfere with the plaintiff?
46. 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.
47. Is it the defendant's contention, allegation or belief that the defendant's interception of the plaintiff's private matters was not a wilful act?
48. 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.
49. Is it the defendant's contention, allegation or belief that the defendant's actions were not secret?
50. 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.
51. Is it the defendant's contention, allegation or belief that the plaintiff had no reasonable expectation of privacy because the plaintiff's records were public records?
52. 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.
53. Is it the defendant's contention, allegation or belief that the plaintiff had no reasonable expectation of privacy because the plaintiff's actions were in a public place?
54. 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.
55. Is it the defendant's contention, allegation or belief that the information described as the plaintiff's private information was not private but was public knowledge?
56. 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.
57. Please describe all defenses claimed by the defendant, including:
 - a. The substance of each such defense, and
 - b. All facts which support each such defense.
58. Please state in complete detail the facts which form the basis for whatever legal relationship the defendant claims existed between the plaintiff and the defendant at the time of the alleged occurrence.
59. If the defendant contends that the disclosure of information as alleged in the plaintiff's complaint was not negligent, reckless or intentional, please describe in detail the defendant's exercise of due care with respect to each such disclosure.
60. Does the defendant contend that the plaintiff consented to the disclosure of any items of information involved in this action?
61. If the answer to the preceding interrogatory is in the affirmative, please state as to each such consent:
 - a. The time, date and place of each consent,
 - b. Whether such consent was oral or written,
 - c. The name and address of each person having a copy of any written consent,
 - d. The name and address of each person to whom such consent was given,
 - e. The substance of such consent, and
 - f. The name and address of each witness to such consent.

62. If the defendant contends that any part of any disclosure involved in the action was not understood, was taken in jest or was given some meaning other than the obvious by anyone, please state:
- The relevant disclosure,
 - The name and address of each person alleged to have misunderstood such disclosure, and
 - All facts which support this contention.
63. With respect to each disclosure alleged in the plaintiff's complaint, if the defendant claims any complete or partial privilege or immunity as a defense, please state in detail each such privilege or immunity and each reason why you believe each such privilege or immunity applies.
64. With respect to each disclosure alleged in the plaintiff's complaint, if the defendant claims that such disclosure was made in a reasonable manner for a proper purpose, please describe in detail such reasonable manner and any proper purpose and state why this may entitle the defendant to a qualified privilege.
65. Does the defendant contend that the plaintiff's reputation at the time of the alleged occurrence was already so discredited that the alleged disclosure did not significantly impugn the plaintiff's reputation?
66. If the answer to the preceding interrogatory is in the affirmative, please state:
- All facts which support such contention, and
 - Explain how the damage to the plaintiff did not significantly damage the plaintiff's public image/reputation.
67. If the defendant contends that he or she was repeating or relying upon what others had published about the plaintiff, please:
- Describe in detail each such prior publication, indicating the date and source, and
 - Explain why the defendant repeated such publication.

Alienation of Affections.

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 alleged alienation of affection or alleged attempted alienation of affection of (the plaintiff's spouse) by the defendant.

- At the time of the alleged occurrence, did the defendant have any knowledge of the plaintiff's marital relationship and legal status of marriage to the plaintiff's spouse?
- If your answer to the preceding interrogatory is in the affirmative, please state as to the defendant's knowledge:
 - The date and time when the defendant first became aware or had knowledge that the plaintiff was married to (the plaintiff's spouse),
 - The source of the defendant's knowledge,

- c. The substance of what the defendant knew about the relationship and legal status between the plaintiff and (the plaintiff's spouse),
 - d. The identity of each person, including name and address, of each person who was a witness to or had any knowledge of what the defendant knew about the plaintiff's marital relationship and legal status with (the plaintiff's spouse), and
 - e. Please identify any writing, document or record which is relevant to the question of what knowledge the defendant had as to the marital relationship and legal status of the plaintiff and (the plaintiff's spouse).
3. At the time of the alleged occurrence, please describe the defendant's attitude toward the plaintiff's marital relationship and legal status to (the plaintiff's spouse):
 - a. The substance of the defendant's attitude,
 - b. Each reason or explanation for the defendant's attitude, and
 - c. The first date when the defendant formed an attitude, indicating what that attitude was at that time.
4. At the time of the alleged occurrence, please describe the defendant's attitude toward the plaintiff:
 - a. The substance of the defendant's attitude,
 - b. Each reason or explanation for the defendant's attitude, and
 - c. The first date when the defendant formed an attitude about the plaintiff, indicating what that attitude was at that time.
5. Prior to and at the time of the alleged occurrence, did the defendant have any oral or written communications with (the plaintiff's spouse)?
6. If your answer to the preceding interrogatory is in the affirmative, please state as to each and every oral or written communication by the defendant with (the plaintiff's spouse):
 - a. Each date, time and place,
 - b. The substance of each communication, indicating who said what to whom,
 - c. The manner and method of each communication, whether oral in person, oral over the telephone, a written letter or note, or otherwise,
 - d. Whether each communication was initiated by the defendant or otherwise, and
 - e. The defendant's knowledge of the veracity of each communication indicating the source of the knowledge, the substance of the knowledge, the date and time and any witness or record to each.
7. Prior to and at the time of the alleged occurrence, did the defendant visit or spend any time with or in the presence of (the plaintiff's spouse)?
8. If your answer to the preceding interrogatory is in the affirmative, please state as to each visit and each period of time that the defendant was in the presence of (the plaintiff's spouse):
 - a. Each date, time and place,
 - b. The frequency of each visit,
 - c. The purpose or reason for each visit or period of time spent,
 - d. Whether the defendant initiated each visit, and

- e. A description of any physical sexual contact between the defendant and (the plaintiff's spouse) at each visit or period of time spent by the defendant with (the plaintiff's spouse).

Intentional Interference with Marital Relationships.

Definitions

The term "the plaintiff's spouse" as used in these interrogatories shall mean the person with whom the plaintiff has an alleged marriage relationship which, it is alleged, was interfered with by the defendant.

The term "alleged occurrence" as used in these interrogatories shall mean the conduct and actions of the defendant which affected or interfered with the alleged marriage relationship between the plaintiff and the plaintiff's spouse, as alleged in the plaintiff's complaint.

1. Please identify yourself, giving your full name, residence, business address, and occupation.
2. Please state as to each and every witness, including parties, known to the defendant to have seen, heard, or known about the alleged interference:
 - a. The name and address of each witness,
 - b. The place where each witness was at the time the witness saw, heard, or learned about the alleged interference,
 - c. The substance of all information or knowledge about the alleged interference known to each witness, and
 - d. Whether any such witness gave any statement or account, either oral or in writing, of the witness' knowledge of the alleged interference, and if so, the substance of each such statement or account.
3. 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.
4. If you claim that any other person caused or contributed to cause the alleged occurrence, please state the name and address of each such person and the manner in which each such person caused or contributed to cause the alleged occurrence.
5. Please state whether the defendant had any knowledge of the alleged marriage relationship between the plaintiff and the plaintiff's spouse.
6. If the answer to the preceding interrogatory is in the affirmative, please describe in detail the defendant's knowledge of that relationship, including:
 - a. The date the marriage was entered into,
 - b. The parties to the marriage,
 - c. The sources of the defendant's knowledge,

- d. The exact information received from those sources,
 - e. The dates on which the defendant received such information,
 - f. Whether the defendant believed that the marriage was valid, and
 - g. Whether the defendant believed that the marriage was enforceable.
7. If the defendant had no knowledge of the alleged marriage relationship between the plaintiff and the plaintiff's spouse, did the defendant know or have reason to believe that the plaintiff had any dealings or communications with the plaintiff's spouse?
8. If the answer to the preceding interrogatory is in the affirmative, please explain in detail what the defendant knew or had reason to believe, including:
- a. Whether the plaintiff existed,
 - b. Whether the plaintiff's spouse existed,
 - c. The nature of the marriage between the plaintiff and the plaintiff's spouse,
 - d. The subject matter of all such dealings or communications,
 - e. The sources of the defendant's awareness of such marriage,
 - f. The exact information received from those sources, and
 - g. The dates on which the defendant received such information.
9. Please describe all dealings or communications that the defendant had with the plaintiff in the three-year period immediately prior to the alleged occurrence including:
- a. The dates of all such dealings or communications,
 - b. The subject matter of all such dealings or communications,
 - c. The terms of all such dealings or communications, and
 - d. The consequences of all such dealings or communications.
10. Please describe all dealings or communications that the defendant had with the plaintiff's spouse in the three-year period immediately prior to the alleged occurrence, including:
- a. The dates of all such dealings or communications,
 - b. The subject matter of all such dealings or communications,
 - c. The terms of all such dealings or communications, and
 - d. The consequences of all such dealings or communications.
11. Did the defendant and the plaintiff have a business, personal or fiduciary relationship with each other prior to, or at the time of, the alleged occurrence?
12. If the answer to the preceding interrogatory is in the affirmative, please state:
- a. The date the relationship was commenced,
 - b. The date the relationship was ended,
 - c. The manner in which the relationship was commenced,
 - d. The manner in which the relationship was ended,
 - e. The reason(s) why the relationship was begun,
 - f. The reason(s) why the relationship was ended,
 - g. The nature of the relationship,
 - h. The obligations of the defendant,
 - i. The obligations of the plaintiff,
 - j. The benefits to the defendant,

- k. The benefits to the plaintiff,
- l. The frequency of contact between the defendant and the plaintiff, and
- m. The locations and custodians of all records, in whatever form, pertaining to the relationship.

13. Did the defendant and the plaintiff's spouse have a business, personal, or fiduciary relationship with each other prior to, or at the time of, the alleged occurrence?

14. If the answer to the preceding interrogatory is in the affirmative please state:

- a. The date the relationship was commenced,
- b. The date the relationship was ended,
- c. The manner in which the relationship was commenced,
- d. The manner in which the relationship was ended,
- e. The reason(s) why the relationship was begun,
- f. The reason(s) why the relationship was ended,
- g. The nature of the relationship,
- h. The obligations of the defendant,
- i. The obligations of the plaintiff's spouse,
- j. The benefits to the defendant,
- k. The benefits to the plaintiff,
- l. The frequency of contact between the defendant and the plaintiff's spouse, and
- m. The location and custodian of all records, in whatever form, pertaining to the relationship.

15. Did the defendant maintain any relationship with the plaintiff other than a business, personal or fiduciary relationship (such as trust or competition) prior to, or at the time of the alleged occurrence?

16. If the answer to the preceding interrogatory is in the affirmative, please describe that relationship in detail, including all duties of and benefits to, the defendant which derived from that relationship.

17. Did the defendant maintain any relationship with the plaintiff's spouse other than a business, personal or fiduciary relationship (such as trust or competition) prior to, or at the time of the alleged occurrence?

18. If the answer to the preceding interrogatory is in the affirmative, please describe that relationship in detail, including all duties of, and benefits to, the defendant which derived from the relationship.

19. Did the defendant seek advice relating, directly or indirectly, to the subject matter of the alleged occurrence prior to the alleged occurrence?

20. If the answer to the preceding interrogatory is in the affirmative, please state:

- a. The dates such advice was sought,
- b. The name, address, and occupation of each person from whom such advice was sought,
- c. The nature of the advice received, and
- d. The content of the advice received.

21. Please describe in detail the defendant's knowledge of each incident of the alleged occurrence, including for each such incident:
- a. The name and address of each person who participated in such incident, and the relationship, if any, of each such person to the defendant,
 - b. The name and address of each other person who witnessed or was present at such incident, and the relationship, if any, of each such person to the defendant,
 - c. Each place where such incident occurred, giving state, city, street address, and a description of the vicinity of each participant,
 - d. The time at which such incident occurred, giving the date, hour, and minute,
 - e. A detailed chronological description of such incident, stating everything that each participant did or said, and
 - f. The source of the defendant's knowledge about such incident.
22. Please describe in detail each and every communication, in whatever form, between the defendant and the plaintiff concerning the subject matter of the alleged occurrence, including for each such communication:
- a. The time and place at which it was made,
 - b. The name and address of each person who participated in, witnessed, or has any direct knowledge of such communication, and the relationship, if any, of each such person to the defendant,
 - c. The nature of such communication (e.g., oral, written, gesture), specifying which portions were made in each manner,
 - d. The medium through which such communication was made (e.g., mail, telephone, telegram),
 - e. The exact wording of each communication, whether oral or written, giving all statements in chronological order with the person making each statement clearly identified,
 - f. A complete description of each gesture, signal, demonstration, or other nonverbal communication, indicating when each took place in the context of any verbal communications and giving the identity of the person making each such nonverbal communication, and
 - g. A complete description of each object, person, condition, circumstances, event, thought, intention, opinion, or other thing which was the subject matter of such communication.
23. Please describe in detail each and every communication, in whatever form, between the defendant and the plaintiff's spouse concerning the subject matter of the alleged occurrence, including for each such communication:
- a. The time and place at which it was made,
 - b. The name and address of each person who participated in, witnessed, or has any direct knowledge of such communication, and the relationship, if any, of each such person to the defendant,
 - c. The nature of such communication (e.g., oral, written, gesture), specifying which portions were made in each manner,
 - d. The medium through which such communication was made (e.g., mail, telephone, telegram),

- e. The exact wording of each communication, whether oral or written, giving all statements in chronological order with the person making each statement clearly identified,
 - f. A complete description of each gesture, signal, demonstration, or other nonverbal communication, indicating when each took place in the context of any verbal communications and giving the identity of the person making each such nonverbal communication, and
 - g. A complete description of each object, person, condition, circumstance, event, thought, intention, opinion, or other thing which was the subject matter of such communication.
24. Please describe in detail each and every communication, in whatever form, between the defendant and any person other than the plaintiff or the plaintiff's spouse which concerned the subject matter of the alleged occurrence and which reached or could have reached the plaintiff or the plaintiff's spouse, stating for each such communication:
- a. When and where such communication occurred,
 - b. The name and address of each person who participated in, witnessed or has any direct knowledge of such communication, and the relationship of each such person to the defendant, the plaintiff, or the plaintiff's spouse,
 - c. The nature of such communication,
 - d. The medium of such communication,
 - e. The substance of such communication, giving the exact words or gestures used and indicating which person made each statement or gesture,
 - f. Whether the defendant expected or foresaw that such communication could reach the plaintiff or the plaintiff's spouse, and if so, how,
 - g. Whether such communication in fact reached the plaintiff or the plaintiff's spouse, and if so, how, and
 - h. Whether the defendant intended such communication to reach the plaintiff or the plaintiff's spouse.
25. Please state the present location of each and every written, printed, typed, recorded, taped, or photographic communication referred to in the answers to interrogatories 22, 23 and 24, and please state when and where each such writing, printing, typescript, recording, tape, or photograph may be examined by counsel for the plaintiff.
26. Did the defendant, or anyone else, benefit or profit, or expect to benefit or profit, in any way from the alleged occurrence?
27. If the answer to the preceding interrogatory is in the affirmative, please:
- a. Describe the nature of each such expected or actual benefit or profit,
 - b. Identify all persons to whom each such expected or actual benefit or profit accrued or was expected to accrue,
 - c. Identify all persons from whom each such expected or actual benefit or profit was derived or expected to derive,
 - d. Describe the value of each such expected or actual benefit or profit, indicating the exact amount of any monetary gain,
 - e. Describe the plaintiff's awareness of each such expected or actual benefit or profit, indicating when and how the plaintiff was made aware of such benefit or profit, and

- f. Describe the plaintiff's spouse's awareness of each such expected or actual benefit or profit, indicating when and how the plaintiff's spouse was made aware of such benefit or profit.
28. Please describe all written statements and reports made by you regarding the alleged occurrence, including:
- The date of each such written statement or report, and
 - The substance of each such written statement or report.
29. Did the defendant receive notice of any kind from the plaintiff, or from someone on behalf of the plaintiff, relating to the alleged occurrence?
30. If the answer to the preceding interrogatory is in the affirmative, please state as to any such notice:
- The date and time of receipt,
 - The manner in which notice was given, indicating whether oral or in writing,
 - The substance of such notice, and
 - The identification of the person from whom such notice was received.
31. Does the defendant contend that the plaintiff, either through action or inaction, caused or in any way contributed to cause the alleged occurrence?
32. If the answer to the preceding interrogatory is in the affirmative, please explain in detail each fact or circumstance on which the defendant bases such a contention.
33. Does the defendant contend that its acts, allegedly constituting interference with the contractual relationship between the plaintiff and the plaintiff's spouse, were unintentional?
34. If the answer to the preceding interrogatory is in the affirmative, please explain in detail each fact or circumstance on which the defendant bases such a contention.
35. Does the defendant contend that the plaintiff suffered no damage from the alleged occurrence?
36. If the answer to the preceding interrogatory is in the affirmative, please explain in detail each fact or circumstance on which the defendant bases such a contention.
37. If the defendant admits having done the acts allegedly constituting interference with the contractual relationship between the plaintiff and the plaintiff's spouse, does the defendant contend that:
- Its action was normal under the circumstances,
 - Its action was to be expected under the circumstances,
 - Its action was necessary to protect its own interests,
 - Its action was reasonable to protect its own interests,
 - Its action was a reasonable response to provocation by the plaintiff, the plaintiff's spouse, or someone else, and if so, please identify who provided such provocation, and
 - It had a legal right to take such action.
38. Please explain in detail the facts and circumstances on which all affirmative answers to the preceding interrogatory are based.

39. If the defendant has made any agreement or has any understanding with any person, firm, or corporation relative to the alleged damages arising out of the alleged occurrence, please state:
- a. When such agreements or understandings were reached,
 - b. With whom such agreements or understandings were reached,
 - c. The subject matter of such agreements or understandings, and
 - d. The terms of such agreements or understandings.
40. Is it the defendant's contention, allegation or belief that the plaintiff's spouse made any fraudulent representation relating to the marriage relationship?
41. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The nature of each representation,
 - b. The substance of each representation,
 - c. The date, time and location of any such representation,
 - d. The name and address of each person who was a witness to or has any knowledge concerning any such representation, and
 - e. The name and address of the location and the custodian of any writing or record.
42. Please state the date when the marriage between the plaintiff and the plaintiff's spouse was legally terminated?
43. Please state whether, at the time of the alleged occurrence, the plaintiff's marriage to the plaintiff's spouse had been constructively terminated, indicating:
- a. The date when the plaintiff and the plaintiff's spouse no longer lived together,
 - b. The date when the plaintiff and the plaintiff's spouse were separated,
 - c. The date when the plaintiff and the plaintiff's spouse were legally separated, and
 - d. The date of the start of divorce proceedings.