

Request for Interrogatories in a Debt Collection Suit

Instructions, Example and Sample Form

You can use [Interrogatories](#) to ask the Plaintiff questions about their case against you. To learn more about interrogatories and how to use them, visit www.masslegalhelp.org and search "[Interrogatories](#)."

Use these instructions to help you fill out the Request for Interrogatories form on page 5. We have also included an **Example** Interrogatory form filled out by a made up person, Kerry Timberland.

1. At the top left corner of the Interrogatory form you will see "_____, ss". This is where you write the county you live in. Put in the same county that is on the complaint that the plaintiff sent to you.
 - In the example, Kerry lives in Dorchester so she lives in Suffolk County.
2. On the "____ Division" line, write in where the court is located.
 - The Court is located in Dorchester so Kerry wrote in "Dorchester."
3. Write in the docket number on the "Docket no._____" line. You can find this number on the complaint that the Plaintiff sent you.
 - Kerry's number was on the top right corner of the complaint so she copied it onto the form as "2011-CV-3833"
4. The "_____plaintiff" line needs to say who is suing you. Copy the name listed on the complaint before the word "plaintiff".
 - The Bank of New Debt is suing Kerry so she wrote "Bank of New Debt" on the line before "plaintiff".
5. The "_____defendant" line needs to say who is being sued. Copy the name listed on the complaint before the word "defendant" on the form. It is probably your name.
 - The Bank of New Debt is suing Kerry so she wrote her name on the line before "defendant".
6. To make a checkmark , hold down the Alt key on your keyboard and type 251 at the same time.
7. **In the "Request for Interrogatories"** section check the line or write in the questions you want the Plaintiff to answer. Interrogatories are questions that let you find out information from the Plaintiff about the case. If you have additional questions write them in.
 - Kerry does not believe that she owes any money to Bank of New Debt so she asked questions to determine when they think she entered into an agreement with them. She also

handwrote her own question to see if they have any connection to the local Department Store that she knows she owes money to.

8. Sign the Request for Interrogatories.
9. **In the “Certificate of Service”** section write:
 - i. the date;
 - ii. your signature;
 - iii. the name and address of the plaintiff, and
 - iv. check “hand delivery” or “first class mail.”
10. Make two copies of all of the forms you are sending.
 - i. File the original at the Court. Deliver it in person or mail it.
 - ii. Mail a copy of the package to the Plaintiff’s attorney.
 - iii. Keep a copy of everything yourself.
11. The plaintiff should send a package of information to you. This information should be the plaintiff’s response to your Interrogatories.

EXAMPLE REQUEST FOR INTERROGATORIES

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT OF THE COMMONWEALTH

SUFFOLK _____, ss.

DORCHESTER DISTRICT COURT

DOCKET NO. 2011-CV-3833

Bank of New Debt _____)

Plaintiff,)

v.)

Kerry Timberland _____)

Defendant.)

REQUEST FOR INTERROGATORIES
TO BE ANSWERED BY THE
PLAINTIFF

Check the boxes of the questions you would like answered:

1. Please state the name, address, employer and job title of the individual answering these questions.

2. Please state the name, address, employer and job description of the alleged individual, who entered into a contract for repayment of debt with the defendant.

3. Please state the date and time when the agreement for repayment of debt was allegedly reached with the defendant.

4. Please state the names, addresses, employer and job description of all individuals whom you intend to call upon as witnesses to sustain your burden of proof in this matter.

5. Please state all facts you intend to introduce at trial to sustain your burden of proof in this matter.

6. Please state the connection between Bank of New Debt and Local Department store.

Respectfully submitted,

Signed: Kerry Timberland

Your name: Kerry Timberland

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for the Plaintiff (*check one*) in hand () or by regular first class mail postage pre-paid (√) at this address: Law Firm of Ted Roco for Bank of New Debt, 1 Kimble St, Boston, MA 02222 on (date) June 30, 2012.

Kerry Timberland

June 30, 2012

EXAMPLE

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT OF THE COMMONWEALTH

County: _____, SS.

_____ DISTRICT COURT
DOCKET NO. _____

_____,)
Plaintiff)
)
v.)
)
Your name: _____,)
Defendant.)
_____)

REQUEST FOR INTERROGATORIES
TO BE ANSWERED BY THE
PLAINTIFF

- .. 1. Please state the name, address, employer and job title of the individual answering these questions.
- .. 2. Please state the name, address, employer and job description of the individual, who entered into a contract for repayment of debt with the defendant.
- .. 3. Please state the date and time when the agreement for repayment of debt was reached with the defendant.
- .. 4. Please state the names, addresses, employer and job description of all individuals whom you intend to call upon as witnesses to sustain your burden of proof in this matter.
- .. 5. Please state all facts you intend to introduce at trial to sustain your burden of proof in this matter.

Respectfully submitted,

Signed: _____
Your name:

CERTIFICATE OF SERVICE

I hereby certify that on date: _____, that I served the Plaintiff's counsel, *law firm and address:* _____, a copy of this document by - _____ mailing it first class mail (with postage I paid for), _____ hand delivery.

Signed: _____
Your name: