

NO. 04-11-00459-CV

GERALD ANTHONY GARCIA  
Plaintiff

§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

V.

438<sup>th</sup> JUDICIAL DISTRICT

VIA METROPOLITAN TRANSIT  
Defendant

OF BEXAR COUNTY, TEXAS

**PLAINTIFF’S INTERROGATORIES TO DEFENDANT**

(First Set)

Plaintiff Garcia requests that defendant VIA Metropolitan Transit, through an authorized agent of the corporation, answer the following interrogatories under oath and serve the upon plaintiff within 30 days, pursuant to Rule 197 of the Texas Rules of Civil Procedure.

**DEFINITIONS**

The following terms used in these interrogatories have the following meanings:

1. To “identify” means to (a) state a person’s full name, home address, business occupation, business address, and present and past relationship to any party; (b) state the title of any document, who prepared it, when it was prepared, where it is located, and who its custodian is.

2. A “communication” means all oral conversations, discussions, letters, telegrams, memoranda, and any other transmission of information in any form, both oral and written.

**INSTRUCTIONS**

1. In answering each interrogatory:

a. State whether the answer is within the personal knowledge of the person answering the interrogatory and, if not, the identity of each person known to have personal knowledge of the answer;

b. Identify each document that was used in any way to formulate the answer.

2. Unless expressly stated otherwise, each interrogatory relates to the time period beginning October 4, 2004, through and including the date on which answers to these interrogatories are signed.

## INTERROGATORIES

1. Identify each person who witnessed, or claims to have witnessed, the collision between the vehicle driven by defendant and plaintiff occurring on October 5, 2004.
2. Identify each person who was present, or claims to have been present, at the scene of the collision during and after the collision, other than the persons identified in Interrogatory # 1 above.
3. Identify each person who has any knowledge of the facts of the collision, other than those persons already identified in Interrogatories # 1 and 2 above.
4. Identify all communication between defendant's employees and defendant's counsel between October 4, 2004 and the present date.
5. State the facts upon which you base your denial of the plaintiff's claims you acted negligently.
6. As to each expert expected to testify at trial, state:
  - a. His full name, address, and professional qualifications;
  - b. The subject matter on which he is expected to testify;
  - c. The substance of the facts and opinions to which the expert is expected to testify; and
  - d. A summary of the grounds of each opinion.

Dated: July 15, 2009

---

Mark Kx  
Fx & Kx, P.C.  
1234 Third St  
San Antonio, TX 78209  
(210)-555-5555