



2723 South State Street, Suite, 150
Ann Arbor MI 48104
(866) 534 6177
LawCompany.com

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF [REDACTED]**

[REDACTED]

Plaintiff/Counter-Defendant,

Case No. [REDACTED]

V.

HON. [REDACTED]

[REDACTED]

Defendants/Counter-Plaintiffs.

[REDACTED]
Attorney for Plaintiff/Counter Defendant
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
Attorney for Defendants/Counter Plaintiffs
[REDACTED]
[REDACTED]
[REDACTED]

**PLAINTIFF/COUNTER-DEFENDANT [REDACTED] FIRST SET OF
INTERROGATORIES TO DEFENDANTS/COUNTER-PLAINTIFFS [REDACTED]
[REDACTED] AND [REDACTED]**

NOW COMES, Plaintiff/Counter-Defendant, [REDACTED] through his Attorney, [REDACTED], of [REDACTED] submits his first set of Interrogatories to Defendants/Counter- Plaintiffs, [REDACTED] and [REDACTED] pursuant to Michigan Court Rule 2.309. Defendants/Counter- Plaintiffs are required to prepare and serve answers separately and fully in writing under oath within twenty-eight (28) days from the date that these



Interrogatories are served to Plaintiff/Counter-Defendant's attorney's office, [REDACTED]
[REDACTED]

In your answers to the following Interrogatories, you shall:

(a) State whether the information furnished is within the personal knowledge of the person answering and, if not, the name, if known, of each person to whom the information is a matter of personal knowledge.

(b) Identify each person who assisted or participated in preparing and/or supplying any of the information given in answer to, or relied upon in preparing answers to these, Interrogatories.

(c) When identification of any person or party is required herein, give his or her: (i) name; (ii) each business and residence address; identifying each address as being a business or residence address; (iii) business and residence telephone numbers, designating each; and (iv) employer; if any, and his or her position.

(d) When any interrogatory, or your answer thereto, refers to any writing, give: (i) its date; (ii) the author or addressor; (iii) the addresses; (iv) the recipients of all copies; (v) the present location of the original and all copies, if any; and (vi) (a) the identity of the person presently in custody, control or possession of the original and each copy, if any; (b) a detailed summary of the contents thereof, in lieu of such summary, attach a copy thereof to your answers to these interrogatories, identifying it in your answer.

(e) If you maintain that any document or record which refers or relates to anything about which these interrogatories ask has been destroyed, set forth the content of said document, the location of any copies of said document, the date of such destruction and the name of the individual(s) who ordered or authorized such destruction.

(f) Each answer should relate to all times relevant to the complaint or counter-complaint, and when your answer is different for different times within a relevant period, so state, setting forth your different answers and period to which each relates.

(g) When any interrogatory, or your answer thereto, refers to any communication, (1) Give – (i) its date and time; (ii) the communicants; (iii) all persons present during, or who witnessed, the communication; and (2) Give – (i) a detailed summary of the content thereof.

These discovery requests are continuing, and Defendants/Counter-Plaintiffs have a duty to reasonable supplement their answers.

DEFINITIONS

1. The terms “Defendants,” “You,” “Your,” “Counter-Plaintiffs,” as used herein, refer to [REDACTED] and [REDACTED], jointly, their attorney, or any person acting as their agent or otherwise on their behalf answering these Interrogatories.

2. The term “[REDACTED],” as used herein, refer to Defendant/Counter-Plaintiff, [REDACTED] his attorney, or any person acting as his agent or otherwise on his behalf.

3. The terms “Plaintiff,” “Counter-Defendant,” or “[REDACTED]” as used herein, refer to Plaintiff/Counter Defendant [REDACTED], an individual.

4. The term “Property” as used herein, refer to the Property specifically described as [REDACTED]
[REDACTED]
[REDACTED] Records that
[REDACTED]

5. The term “Complaint” shall mean and refer to the complaint filed by Plaintiff as Case No. [REDACTED] titled [REDACTED] filed before the

██████████, State of Michigan on ██████████ which was ██████████
██████████

6. The term “Counter-Complaint” shall mean and refer to the counter-complaint filed by Defendants in ██████████ titled as ██████████
██████████ before the ██████████ County, ██████████ Judicial Circuit Court on ██████████

7. The term “Communication” shall mean and include all communication, whether written or oral or by electronic means, including, but not limited to, telephone conversations, letters, memoranda, e-mails, facsimiles, reports, interviews, statements, contracts, agreements and consultations. Whenever a request refers to conversations with others, such request also refers to communications with all persons acting on behalf of that other, including, but not limited to, employees, officers, managers, directors, parent corporations, subsidiaries, associates, consultants, investigators, secretaries, assistants, agents, brokers, claims adjusters, or attorneys.

8. The term “Date” means the exact date, month and year, if ascertainable, or, if not, the best available approximation.

9. The term “Possession” means any document in your possession, custody or control.

10. The term “Describe,” when used in a request to characterize an event, act, or occurrence, shall mean to provide the following information:

- a. A concise description of the events, acts, or occurrences including, but not limited to, the date of such events, acts or occurrences;
- b. The name, employer, position, address, telephone number and email address of each Person who was involved in, or with knowledge of, each described event, act or occurrence;
- c. Identify all Documents evidencing the facts described.

11. The terms “Document” and “Documents,” as used herein, include any writings, recordings, text messages, transcriptions, notes, or any other form of physical evidence. Specifically, the terms “Document” and “Documents,” as used herein include any matter or tangible thing containing or recording any handwriting, typewriting, printing, photographing, or any other means of recording on any tangible thing, any form of communication, including letters, texts, words, pictures, sounds, or symbols, or combinations thereof, and it further includes any oral communication later reduced to writing or confirmed by writing.

12. The terms “Communication” or “Communications” means all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, conferences, telephone conversations, interviews, cards, letters, emails, faxes, notes, correspondence, telegrams, telexes, cables, or other forms of interpersonal discourse, whether oral or written, however transmitted, including reports, notes, memoranda, lists, agenda, and other reports of communications.

a. “Identify,” as used herein in connection with a “communication,” “communications” or “oral statement,” means:

b. Furnish the date and place of the communication.

c. Identify the person(s) participating in the communication and those present at the communication.

d. Describe in detail the subject(s) discussed in the communication.

13. The term “Concerns,” “concerning,” or “relating to” mean consisting of, mentioning, referring to, describing, constituting, discussing, relating to, citing, pertaining to, regarding, evidencing, responding to, comprising, showing, forming the basis of, containing, summarizing, supporting, or analyzing, whether directly or indirectly, the matter discussed.

14. “Identify” or “identity” means to state or a statement of:

- a. In the case of a person other than a natural person, its name, the address of its principal place of business (including zipcode), its telephone number, and the name of its chief executive officer, as well as, if it has a person other than a natural person that ultimately controls it, that other person's name, address, telephone number;
- b. In the case of a natural person, his or her name, business address and telephone number, employer, and title or position;
- c. In the case of a document, the title of the document, the author, the title or position of the author, the addressee, each recipient, the type of document, the subject matter, the date of preparation, and its number of pages; and
- d. In the case of an agreement, its date, the place where it occurred, the identity of all persons who were parties to the agreement, the identity of each person who has knowledge of the agreement and all other persons present when it was made, and the subject matter of the agreement.
- e. These Interrogatories shall be deemed continuing, and supplementary answers shall be required if you directly or indirectly obtain further information after your Answers to these Requests are filed.

INTERROGATORIES

INTERROGATORY NO. 1:

Please Describe all facts that support your contention that [REDACTED] "often does transactions (including setting up corporations, limited liability companies, or other entities) in other People's names as alleged in Your Counter-Complaint.

RESPONSE:



INTERROGATORY NO. 2:

Please Describe all facts that support your contention that ‘ [REDACTED]
[REDACTED]’ as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 3:

Please Describe all facts that support your contention that there was an ‘ [REDACTED]
[REDACTED]’ from [REDACTED] name to that of the Counter-Plaintiffs as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 4:

Please Describe all facts that support your contention that You [REDACTED] for the [REDACTED]
[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 5:

Please Describe all facts that support your contention tha [REDACTED]
[REDACTED]
[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:



INTERROGATORY NO. 6:

Please Describe all facts that support your contention that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 7:

Please Describe all facts that support your contention that [REDACTED]
[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 8:

Please Describe all facts that support your contention that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] as alleged
in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 9:

Please Describe all facts that support your contention that [REDACTED]
[REDACTED]

██████████
██████████
██████████
██████████ alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 10:

Please Describe all facts that support Your contention that ██████████
██████████
██████████

██████████ as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 11:

Please Describe all facts that support Your contention that ██████████
██████████
██████████

██████████ as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 12:

Please Describe all facts that support Your contention that ██████████
██████████
██████████

as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 13:

Please Describe all facts that support Your contention [REDACTED]

[REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 14:

Please Describe all facts that support Your contention that [REDACTED]

[REDACTED]

[REDACTED] as alleged

in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 15:

Please Describe all facts that support Your contention that [REDACTED]

[REDACTED] alleged in

Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 16:

Please Describe all facts related to Your Communications regarding [REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 17:

Please Describe all facts that support Your contention that [REDACTED]

[REDACTED] as alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 18:

Please Describe all facts that support [REDACTED]

[REDACTED]
[REDACTED] as

alleged in Your Counter-Complaint.

RESPONSE:

INTERROGATORY NO. 19:

Please Describe all facts that support Your contention that [REDACTED]

[REDACTED]

RESPONSE:

INTERROGATORY NO. 20:

Please state whether [REDACTED]

[REDACTED]

RESPONSE:

INTERROGATORY NO. 21:

Please state whether [REDACTED]

RESPONSE:

INTERROGATORY NO. 22:

Please Describe all facts related [REDACTED]

RESPONSE:

INTERROGATORY NO. 23:

Please state whether [REDACTED]

RESPONSE:

INTERROGATORY NO. 24:

Please Describe all facts that lead to the [REDACTED]

[REDACTED]

RESPONSE:

INTERROGATORY NO. 25:

Please state whether You [REDACTED]

[REDACTED]

RESPONSE:

INTERROGATORY NO. 26:

Please state whether You had [REDACTED]

RESPONSE:

INTERROGATORY NO. 27:

Please state whether, at the time of the alleged [REDACTED]

[REDACTED]

[REDACTED].

RESPONSE:

INTERROGATORY NO. 28:

State whether [REDACTED]

[REDACTED]

RESPONSE:

INTERROGATORY NO. 29:

Identify all persons who You believe may have discoverable information relevant to this litigation and describe the nature of the information possessed by such persons.

RESPONSE:

INTERROGATORY NO. 30:

Identify each Person who you may call as a witness, and as to each Person, describe the matter in which such Person is expected to testify, including any Documents that such Person will testify about, and a summary of the Person's expected testimony.

RESPONSE:

INTERROGATORY NO. 31:

For each of the above Persons, please state whether they have personal knowledge regarding the facts of this lawsuit.

RESPONSE:

Respectfully submitted

[REDACTED]
Attorney for Plaintiff/Counter Defendant

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dated: February ____, 2021



STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF [REDACTED]

[REDACTED]

Plaintiff/Counter-Defendant,

Case No. [REDACTED]

V.

HON. [REDACTED]

[REDACTED]

Defendants/Counter-Plaintiffs.

[REDACTED]
Attorney for Plaintiff/Counter Defendant

[REDACTED]
Attorney for Defendants/Counter Plaintiffs

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

PROOF OF SERVICE

On February ____, 2021, I served a copy of the foregoing first set of interrogatories in the above captioned matter by First Class Mail by enclosing the same in an envelope with sufficient postage to:

[REDACTED]
Attorney for Defendants/Counter Plaintiffs

[REDACTED]
[REDACTED]
[REDACTED]

Dated: February ____, 2021

[REDACTED]
Affiant