

**Form D. Uniform Interrogatories by Defendant in Motor Vehicle Collision Case Involving Property
Damage: Special Civil Part**

All questions must be answered unless the court otherwise orders or unless a claim of privilege or protective order is made in accordance with R. 4:17-1(b)(3).

PLEASE ANSWER THE FOLLOWING QUESTIONS WITH RESPECT TO THE COLLISION DESCRIBED
IN THE PLAINTIFF'S COMPLAINT.

1. State the registration number, make, model and year of the plaintiff's vehicle.
2. Specifically describe the condition of the vehicle immediately before the collision.
3. Specifically describe how the vehicle was damaged in the collision.
4. Please state: A) Did you obtain an estimate of repairs for the damage to the vehicle? If so, B) list the estimated cost of each repair and attach a copy of the estimate of repairs including the name and address of the person or company providing the estimate.
5. Please state: A) Has the vehicle been repaired since the collision? If so, B) list each repair; C) the price paid for each repair; D) the date of each repair; E) the name and address of each person or company performing the repairs. Attach copies of all repair bills.
6. If the motor vehicle was declared a total loss, attach all documents relating to the Actual Cash Value of the vehicle, salvage value and any related expenses.
7. Please state: A) Did the plaintiff rent a replacement vehicle? If so, B) list the name of the company; C) the price paid; D) the length of time the rental was required; and E) the reasons the rental was required.
8. Please state: A) Did the plaintiff have any other expenses as a result of the collision? If so, B) give an itemized statement of each such expense; C) the cost of each such expense; and D) an explanation of the reason for the expense.
9. List the names and addresses of anyone who may have direct knowledge of any of the facts relating to the collision or this case. Include in your answer eyewitnesses and experts or other witnesses who may testify. Attach copies of expert reports, if any.
10. Give details of the accident: A) date; B) time; C) weather; D) visibility and E) road condition.
11. Who was driving your vehicle at the time of the accident? Name and address.
12. List the names and addresses of the occupants of the vehicle and their location in the vehicle.
13. Where did the accident happen? Street and town.
14. Which street was your vehicle on at the time of the accident?
15. Which direction was your vehicle going at the time of the accident?
16. Where on the roadway did the collision take place? You may include a sketch for greater clarity.
17. Please state: A) How did this accident happen? B) Who was at fault and how? C) Any other factors you believe contributed to the accident.
18. Did the other driver break any laws? If so, which laws?
19. Please state: A) Were there traffic lights, signs, or other controls for any of the vehicles involved in the accident? If so, B) What kind of light, sign or control? C) Where were they? D) Who were they for?
20. Please state: A) Did the accident happen in an intersection? B) Who was in the intersection first? C) Did your car stop before it entered the intersection? D) How fast was your vehicle going when it entered the intersection?
21. Please state: A) How far was your vehicle from the other vehicle when it was first seen? B) How fast was your vehicle going when the other vehicle was first seen? C) How fast was the other vehicle going when it was first seen?

22. After the accident where did the vehicle stop?

23. State what part of your vehicle came into contact with what part of the other vehicle or vehicles involved.

CERTIFICATION

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I hereby certify that the copies of the reports annexed hereto rendered by proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

DATED:

SIGNED: