

PERSONAL INJURY NEGLIGENCE INTERROGATORIES
TO DEFENDANT KS&P RESTARUANTS, LLC
(FLORIDA RULES OF CIVIL PROCEDURE)

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

1. What is the name and address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

2. Describe any and all policies of insurance which you contend cover or may cover you for the allegations set forth in plaintiff's complaint, detailing as to such policies the name of the insurer, the number of the policy, the effective dates of the policy, the available limits of liability, and the name and address of the custodian of the policy.

3. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.

4. State whether you have any photographs, films, movies, video-tapes or other pictures of the accident scene or the plaintiff. If so, please state:

- a) a description of each such picture;
- b) the date each picture was taken;
- c) the name, address and job title of the photographer of each such picture.

5. State the complete name and address of the managing company for the subject premises.

6. State when the subject booth was constructed and the name and address of the company, person(s) or other entity that constructed the booth.

7. State the name and address of the company, person(s) or entity that designed the subject booth and the name and address of the company, person(s) or entity that provided the specifications for the subject booth.

8. State when the subject booth last had velcro fasteners and/or adhesives placed below the base of the booth seat before December, 2006 or the date of the accident. Additionally state:

a) the date of the velcro fasteners and/or adhesives were placed;

b) the name(s) and address(es) and employment position(s) of the person(s) who placed the velcro fasteners and/or adhesives and the company he/she/they worked for;

c) the name, address and employment position of the person(s) who directed and/or supervised the placing of the velcro fasteners and/or adhesives and the name of the company he/she worked for;

d) the type of velcro used, including brand name, identification number and whether any other substances were combined with the velcro, and if so, what substances.

9. State whether any steps or measures have been taken to make the booth more secure or safer at any point in time, either before the accident or after the accident. If so, state:

a) the steps or measures that were taken;

b) the date each step or measure was taken;

c) the name(s), address(es) and job title(s) of the person(s) who directed each such change, and the name of his/her/their company;

d) the name(s), address(es) and job title(s) of the person(s) who performed each such change and the name of his/her/their company.

10. State whether you have received any complaints, notification of injuries, notification of slips and/or falls at the subject restaurant within the last three years and four months. If so, state:

a) the name, address and telephone number of the person involved in each such incident;

b) a description of each such incident, including where on the premises the incident occurred;

c) the date of each such incident;

d) the names, addresses and telephone numbers of all persons who have knowledge of each such incident.

11. State whether you have ever been a party to a lawsuit arising out of personal injuries at the subject premises. If so, state:

a) the style of each such lawsuit;

b) the case number of each such lawsuit;

c) the court where each such lawsuit was filed;

d) the ultimate disposition of each such lawsuit (i.e. settlement, verdict, dismissal, etc.)

13. State whether a management contract exists regarding the subject premises. If so, please state the names of the parties to the agreement and the date of such agreement.

14. Without admitting any liability, do you contend that any person or entity other than the named defendants or the plaintiff caused the subject accident and the plaintiff's injuries. If

so, please identify each such person or entity and how they caused the accident and injuries.

15. State whether you dispute that Winslight Baptiste was a business invitee on the date of the accident. If you do dispute that, please state under what classification you believe he falls under (e.g. trespasser, licensee, etc.).

16. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.

STATE OF FLORIDA)
) ss
COUNTY OF DADE)

BEFORE ME, the undersigned authority, duly authorized administered oaths and take acknowledgments, personally appeared _____, as _____ of _____ a _____ Corporation, on behalf of the Corporation, who being by me first duly sworn to state the truth under oath, states that the attached Answer to Interrogatories are true and correct to the best of his/her knowledge and belief, and that he/she has read the Answer to Interrogatories and knows the contents thereof.

BY:
ITS:

The foregoing instrument was acknowledged before me this _____ day of _____, 2007, by _____, as _____ of _____ a _____ Corporation, on behalf of the Corporation, who is personally known to me or who has produced _____ as identification and who did/did not take an oath.

NOTARY PUBLIC STATE OF FLORIDA

PRINT NAME: _____
MY COMMISSION EXPIRES: _____