# TABLE OF CONTENTS

## **TABLE OF CONTENTS**

## **INTRODUCTION**

## **CHAPTER ONE: DEFINITIONS**

**AGENCY** 

AND/OR

**BASIS OF DISCRIMINATION** 

**CLAIMED INJURY** 

**COMMUNICATION** 

**COMPLAINANT** 

CONCERNING

CONDITION

CONCURRENT

PRE-EXISTING

REQUIRING HEALTH CARE

SUBSEQUENT

**DAMAGES** 

ECONOMIC

NON-ECONOMIC

**PECUNIARY** 

**NONPECUNIARY** 

DATE

**DESCRIBE** 

**DOCUMENTS AND WRITINGS** 

**EMAIL** 

**FACTUAL BASIS** 

**HEALTH CARE** 

**HEALTH CARE PROVIDER** 

**IDENTIFY** 

GENERAL

**BUSINESS ENTITY** 

COMMUNICATION; EVENT; MEETING

DOCUMENT; WRITING

ORAL COMMUNICATION

PERSON

**INCIDENT** 

**INJURY** 

**PERSON** 

**REFER TO; RELATE TO** 

REPORT OF INVESTIGATION

**SOURCE OF INFORMATION** 

**STATEMENT** 

**SUBSTANTIATE** 

USE OF SINGULAR/PLURAL; WORDS CONNOTING GENDER

YOU

## **CHAPTER TWO: INSTRUCTIONS**

ABBREVIATIONS AMBIGUITIES

**ANSWERS AND OBJECTIONS** 

ADMISSIONS

**INTERROGATORIES** 

PRODUCTION OF DOCUMENTS

**CONTINUING DISCOVERY** 

CONVERSATIONS, CONFERENCES, OR MEETINGS

**DEVELOPMENT OF INFORMATION** 

**DOCUMENTS** 

ALREADY PROVIDED IN ROLOR PREVIOUS RESPONSE

DESTROYED, LOST, OR NO LONGER POSSESSED

**ESTIMATES** 

**IDENTIFICATION** 

FORM OF RESPONSES

AVOIDANCE OF DUPLICATE RESPONSES; INCORPORATION OF RESPONSES BY REFERENCE

**BASIS FOR INFORMATION OR BELIEF** 

COMPLETE ANSWERS REQUIRED

**IDENTIFY** 

GENERAL

PERSONS WITH SUFFICIENT KNOWLEDGE

**INQUIRY REQUIRED** 

DILIGENT SEARCH REQUIRED

KNOWLEDGE OF PARTY, AGENTS AND REPRESENTATIVES

**INTERROGATORIES** 

**ANSWERED SEPARATELY** 

ANSWERED WITH INFORMATION NOW AVAILABLE

**LEGAL BASIS** 

**MEMOS AND NOTES** 

**OBJECTIONS; PRIVILEGE CLAIMS** 

**CLAIMS OF PRIVILEGE** 

FORM AND SCOPE OF OBJECTIONS

REFERENCE REQUIRED TO INTERROGATORY OR DOCUMENT REQUEST

REQUESTS FOR PRODUCTION—LIMITATION

**RESTATEMENT OF REQUEST** 

**SCOPE OF INTERROGATORIES** 

SIGNIFICANCE OF OMISSION OF NAMES OR INFORMATION

#### **CHAPTER THREE: INTERROGATORIES**

ABSENCE; LEAVE USAGE

ADMISSIONS—USE WITH INTERROGATORIES

**REQUESTS FOR ADMISSION** 

**INTERROGATORIES** 

**AGE DISCRIMINATION** 

AMENDMENT OF COMPLAINTS

**ATTORNEY FEES** 

**BASIS OF DISCRIMINATION** 

COMMUNICATIONS

**COMPARABLE EMPLOYEES—SIMILARLY SITUATED** 

**CRIMES** 

**DAMAGES** 

AMOUNT

CAUSATION

CAUSATION—OTHER CAUSES

GENERAL—NO. 1

GENERAL—NO. 2

GENERAL—NO. 3

IDENTIFICATION OF HARM—NO. 1

IDENTIFICATION OF HARM—NO. 2

MITIGATION—NO. 1

MITIGATION—NO. 2 **NONPECUNIARY PECUNIARY** OTHER OR PAST CONDITIONS; PAST TREATMENT—NO. 1 OTHER OR PAST CONDITIONS; PAST TREATMENT—NO. 2 DISABILITY ACCOMMODATION REQUESTS—NO. 1 ACCOMMODATION REQUESTS—NO. 2 **ACCOMMODATION REQUESTS—NO. 3 COLLATERAL BENEFIT CLAIMS ESSENTIAL FUNCTIONS—NO. 1 ESSENTIAL FUNCTIONS—NO. 2 IDENTIFICATION NEXUS REASSIGNMENT REPORTING** DISCRIMINATION—GENERAL **DOCUMENTS CONSULTED EVIDENCE EXHIBITS HOSTILE ENVIRONMENT** INCIDENTS OF HARASSMENT **KNOWLEDGE OF SUPERVISORS** MEDICAL ISSUES—GENERAL **NONSELECTION PAST COMPLAINTS** PERFORMANCE APPRAISALS PERSONS CONSULTED **PRETEXT RACE DISCRIMINATION RELIEF SOUGHT RELIGIOUS ACCOMMODATION REPRISAL SEX DISCRIMINATION** WITNESSES **CREDIBILITY EXPERT HEALTH CARE PROVIDERS IDENTIFICATION** 

#### **CHAPTER FOUR: DOCUMENT REQUESTS**

**ABSENCE** 

ADMISSIONS—USE WITH DOCUMENT REQUESTS

AGE DISCRIMINATION

AMENDMENT OF COMPLAINTS

**ATTORNEY FEES** 

**BASIS OF DISCRIMINATION** 

**STATEMENTS** 

**COMMUNICATIONS** 

COMPARABLE EMPLOYEES—SIMILARLY SITUATED

**CRIMES** 

**DAMAGES** 

AMOUNT

**CAUSATION** 

GENERAL

IDENTIFICATION OF HARM

MITIGATION

PECUNIARY

OTHER OR PAST CONDITIONS; PAST TREATMENT

**DISABILITY** 

ACCOMMODATION REQUESTS

COLLATERAL CLAIMS

**IDENTIFICATION** 

**ESSENTIAL FUNCTIONS** 

REASSIGNMENT

**DOCUMENTS CONSULTED** 

**EEO INVESTIGATIONS** 

**EVIDENCE** 

**EXHIBITS** 

**FACTUAL ALLEGATIONS** 

GENERAL

**HOSTILE ENVIRONMENT** 

NONSELECTION

**PAST COMPLAINTS** 

PERFORMANCE APPRAISALS

PERSONS CONSULTED

**PRETEXT** 

**RACE DISCRIMINATION** 

**RELIGIOUS ACCOMMODATION** 

**REPRISAL** 

**SEX DISCRIMINATION** 

**WITNESSES** 

CREDIBILITY

EXPERT

IDENTIFICATION

STATEMENTS

APPENDIX I: EEOC RULES GOVERNING DISCOVERY

APPENDIX II: EEOC MANAGEMENT DIRECTIVE-110 DISCOVERY

APPENDIX III: JUDGES' HANDBOOK: CHAPTER 4-DISCOVERY

APPENDIX IV: FEDERAL RULES OF CIVIL PROCEDURE: RULE 33-INTERROGATORIES

APPENDIX V: FEDERAL RULES OF CIVIL PROCEDURE: RULE 34-DOCUMENT PRODUCTION

<u>APPENDIX VI: FEDERAL RULES OF CIVIL PROCEDURE: RULE 36-ADMISSIONS</u>

APPENDIX VII: FEDERAL RULES OF CIVIL PROCEDURE: RULE 35-MEDICAL EXAMINATIONS