

RULE 4005 – WRITTEN INTERROGATORIES TO A PARTY.

Interrogatories, as a matter of right, shall not exceed FORTY (40) in number. Interrogatories inquiring as to the names and locations of witnesses, or the existence, location and custodian of documents of physical evidence each shall be construed as one (1) interrogatory. All other interrogatories, including subdivisions of one numbered interrogatory, shall be construed as separate interrogatories. If counsel for a party believes that more than FORTY (40) interrogatories are necessary, counsel shall consult with opposing counsel promptly and attempt to reach a written stipulation as to a reasonable number of additional interrogatories. Counsel are expected to comply with this requirement in good faith. In the event a written stipulation cannot be agreed upon, the parties seeking to submit additional interrogatories shall file a motion with the Court showing the necessity for relief.