

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S INTERROGATORIES

Now comes the Plaintiff in the above entitled matter and hereby submits its Objections to the Defendant's Interrogatories.

GENERAL OBJECTIONS

The following general objections are asserted with respect to each and every Request/Interrogatory and are incorporated into each of the Plaintiff's specific responses as if set forth fully therein:

1. Plaintiff objects to the Requests/Interrogatories to the extent they seek to impose burdens or obligations in excess of those required under the Rhode Island Superior Court Rules of Civil Procedure.
2. Plaintiff objects to the Requests/Interrogatories to the extent they call for information that is protected from discovery by a claim of privilege, including the attorney-client privilege, the work product privilege, or any other applicable privilege or doctrine.
3. Plaintiff objects to the Requests/Interrogatories to the extent they contain undefined terms and/or are vague, ambiguous, conclusory, overly broad, unduly burdensome, or designed to harass.

4. Plaintiff objects to the Requests/Interrogatories to the extent they seek information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

5. Plaintiff objects to the Requests/Interrogatories to the extent they purport to require the production of documents not within the Plaintiff's possession, custody or control, or which have not yet come into existence.

6. Plaintiff objects to the Requests/Interrogatories to the extent they seek production of documents which are in the Defendant's possession, available from public sources, or readily accessible, and thus, equally as available to Defendant, as to Plaintiff.

7. None of the responses to the Requests/Interrogatories is an admission relative to the existence of any documents, to the relevance or admissibility of any documents, or to the truth or accuracy of any statement or characterization contained in Defendants' Interrogatories or Discovery.

8. Plaintiff objects to the Requests/Interrogatories to the extent that the Defendant has propounded Requests for Documents improperly as Interrogatories, and in a manner not contemplated by the Rhode Island Superior Court Rules of Civil Procedure.

9. Plaintiff objects to any Requests/Interrogatories to the extent it implies or presupposes that the documents that are produced constitute "all" documents that existed during the relevant time period. Plaintiff will produce only those documents currently in its possession, custody or control, and makes no representation as to whether the documents produced constitute "all" documents that existed during the relevant time period. Moreover, Plaintiff does not purport to have knowledge of "all" documents that are the subject of each Request.

10. Plaintiff objects to producing more than one copy of any document in response to overlapping Requests/Interrogatories. Plaintiff will produce one copy of any document responsive to more than one Request/Interrogatory.

11. Plaintiff reserves the rights to supplement, modify, or add to its responses to the Requests, although Plaintiff does not undertake to do so, except to the extent required by the Rhode Island Superior Court Rules of Civil Procedure.

SPECIFIC RESPONSES

REQUEST NO. 1

State your full legal name, any aliases used now or in the past, occupation, home and business addresses, and social security number.

RESPONSE NO. 1

Objection. Plaintiff objects to this Request/Interrogatory on the grounds that it calls for a residential address and social security number, and on the grounds that it seeks information which is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 2

Provide certified copy of the alleged debt and provide complete account from the beginning of alleged account.

RESPONSE NO. 2

Objection. Plaintiff objects to this request on the grounds that it is vague, ambiguous, incomprehensible, overly broad, unduly burdensome, beyond the scope of permissible discovery and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Defendant is propounding a request for documents improperly as

an Interrogatory, and in a manner not contemplated by the Rhode Island Superior Court Rules of Civil Procedure.

REQUEST NO. 3

Provide a letter stating the whether or not Plaintiff has purchased the alleged debt and for what amount.

RESPONSE NO. 3

Objection. Plaintiff objects to this request on the grounds that it is incomprehensible, overly broad, unduly burdensome, beyond the scope of permissible discovery and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Defendant is propounding a request for documents improperly as an Interrogatory, and in a manner not contemplated by the Rhode Island Superior Court Rules of Civil Procedure.

REQUEST NO. 4

Provide documentation of the alleged payments to the alleged and account and how they were made.

RESPONSE NO. 4

Objection. Plaintiff objects to this Request on the grounds that it is vague, ambiguous, incomprehensible, overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Defendant is propounding a request for documents improperly as an Interrogatory, and in a manner not contemplated by the Rhode Island Superior Court Rules of Civil Procedure.

REQUEST NO. 5

Provide copy of the original credit application, any and all income verification that was provided to alleged account name for the credit application.

RESPONSE NO. 5

Objection. Plaintiff objects to this Request on the grounds that it is vague, ambiguous, incomprehensible, overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Defendant is propounding a request for documents improperly as an Interrogatory, and in a manner not contemplated by the Rhode Island Superior Court Rules of Civil Procedure.

REQUEST NO. 6

Identify all person who have given written or recorded statements concerning the subject matter of this actions, including the date of each statements, the identity of the person taking the statements, and the identity of the present custodian thereof.

RESPONSE NO. 6

Objection. Plaintiff objects on the grounds that this Interrogatory is overbroad, unduly burdensome, seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence, and is beyond the scope of permissible discovery under Rule 26. Plaintiff further objects on the grounds that it seeks information which may be protected by the attorney-client privilege, and/or the attorney work-product doctrine.

REQUEST NO. 7

If you intent to call any expert witnesses to testify at the trial of this case, state the name, address and field of expertise of each such expert and, if any such expert has submitted a written report, attach a copy of same to out Answers to Interrogatories.

RESPONSE NO. 7

Objection. Plaintiff objects on the grounds that it seeks information which may be protected by the attorney-client privilege, and/or the attorney work-product doctrine. Without waiving said objection, Plaintiff states that no determination has yet been made as to whom will be called as an expert witness, or if an expert witness will be called, at the trial of this matter. Plaintiff reserves the right to supplement this Response seasonably prior to trial.

REQUEST NO. 8

State the date, time, place and exact content of each and every conversation which you or your agents, representatives or employees had with the defendant, its agents, representatives, servants and/or employees, in any way pertaining to the occurrences complained of in this lawsuit, identifying the persons or representatives acting on their behalf which spoke during each such conversation and their relationship to the parties, as well as all witnesses to each such conversation and their relationship to you or the defendant, if any.

RESPONSE NO. 8

Objection. Plaintiff objects to this Request on the grounds that it is vague, ambiguous, overly broad and unduly burdensome, that it contains undefined terms, and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 9

If you will rely on any documents or photographs at the trial of this case, identify each such documents, as well as the person with custody of each such documents or a true copy thereof. If you will do so without Motion to Produce, kindly attach a legible photocopy of each such document to your Answers to Interrogatories.

RESPONSE NO. 9

Objection. Plaintiff objects to this Request on the grounds that it is vague, ambiguous, overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that it seeks information which may be protected by the attorney-client privilege, and/or the attorney work-product doctrine. Without waiving said objection, see documents attached.

REQUEST NO. 10

States all avers to the your claim, setting forth all facts and the basis for each such aver.

RESPONSE NO. 10

Objection. Plaintiff objects to this interrogatory to the extent that it is incomprehensible, unnecessarily vague and confusing in that it does not specify what information is requested and as a result the Plaintiff cannot determine the nature and extent of information being sought by this interrogatory.