How to Respond to Interrogatories, Request for Admissions and Request for Production of Documents

This packet contains instructions and format samples for Answers to Interrogatories, Responses to Request for Admissions and Responses to Request for Production of Documents ("Discovery"). These samples are captioned with Las Vegas Justice Court. If you are defending yourself in Henderson Justice Court, North Las Vegas Justice Court or District Court consult the applicable rules of civil procedure and local rules of court. Remember to change the caption to reflect the correct jurisdiction.

When a party is not represented by an attorney, then prior to any discovery request the requesting party must first request permission from the court under JCRCP Rule 25A. Justice Court rules may be found at:

http://www.leg.state.nv.us/CourtRules/JCRCP.html

This packet has been prepared as a courtesy and to assist you prepare your own Pro Se Responses to Interrogatories, Request for Admissions and Request for Production of Documents. The following should not be construed as legal representation or legal advice on how to prepare your case or defense. You are involved in litigation and should seek legal counsel. The telephone number for the Nevada State Bar Lawyer Referral Service is (702) 382 - 0504.

Defendant's Response to Plaintiff's Request for Answers to Interrogatories

Attached is a format sample to assist you in preparing your Answers to Interrogatories.

Remember you only have thirty (30) days from the day you were served to respond. Sanctions may be imposed if you do not respond within thirty (30) days. You must send a copy of your Answers to the Plaintiff's attorney; remember to fill in the certificate of mailing prior to mailing. You do not need to file your Response with the Court Clerk. Keep the original for your records.

Each interrogatory must be stated and answered separately and fully. If you are unable to answer an interrogatory because it is too vague, ambiguous or otherwise objectionable you may state your objection and your reason for objection. If the interrogatory is vague but can still be understood, you should state your objection and then attempt to answer. For example:

Objection: vague. Without waiving this objection

Defendant responds as follows: ______.

For a list of other objections consult the rules of evidence, NRS Chapters 47 through 56.

Verification and proof of service (certificate of mailing) must be included in your Response. The Verification must be completed and signed before a Notary Public; you will need photo identification.

Name Address Telephone Defendant Pro Se

JUSTICE COURT

CLARK COUNTY, NEVADA

) Case No.
1 -	Plaintiff,	
vs.) Dept. No.
¥ D•		
	Defendant.)
)
	DEFENDANT'S ANS	SWERS TO INTERROGATORIES
To:		, Plaintiff; and
To:_		, attorney for Plaintiff:
. *	Defendant,,	in response to the Interrogatories propounded by
the p	plaintiff on the day of _	, 20, states as follows:
	INTERROGATORY NO. 1	: (type entire interrogatory)
	ANSWER TO NO 1	

	Signature Name Address Telephone Defendant Pro S	Se	
ANSWER TO NO. 3: DATED this day of		, 20	
INTERROGATORY NO. 3:			
ANSWER TO NO. 2:			
<u>INTERROGATORY NO. 2</u> :			

VERIFICATION

) ss.		A Company of the Company		
COUNTY OF CLARK)				
		, under p	enalties of p	erjur
eing first duly sworn, deposes	s and says:			
That I am the Defendant	in the above-ent	itled action; th	at I have rea	ad the
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oregoing Answers to Interroga	atories and know	tne contents t	nereor; that t	ine sa
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CERTIFICATE OF MAILING

	I HEREBY CERTIFY that on	the	da	y of	<u> </u>
20	I placed a true and correct of	opy of	the foregoi	ng ANSWERS	S TO
INTI	ERROGATORIES in the United	d States	Mail in La	s Vegas, Neva	da, with firs
class	postage prepaid, addressed to t	he follo	wing:		
					
19					
		Defe	ndant Pro S	e	

Defendant's Response to Plaintiff's Request for Admissions

Attached is a format sample to assist you in preparing your Response to Plaintiff's Request for Admissions.

Remember you have only thirty (30) days from the day you were served to respond. THE STATEMENTS WILL BE CONSIDERED ADMITTED IF YOU DO NOT RESPOND WITHIN THIRTY (30) DAYS. Sanctions may be imposed if you do not respond within thirty (30) days. You must send a copy of your Responses to the Plaintiff's attorney; remember to fill in the certificate of mailing prior to mailing. You do not need to file your Response with the Court Clerk. Keep the original for your records.

You have four choices in responding:

- (1) If you admit the request, write "admit."
- (2) If you deny the request, write "deny." If you admit part and deny part, state what part you admit and what part you deny.
- (3) If you don't know, state:

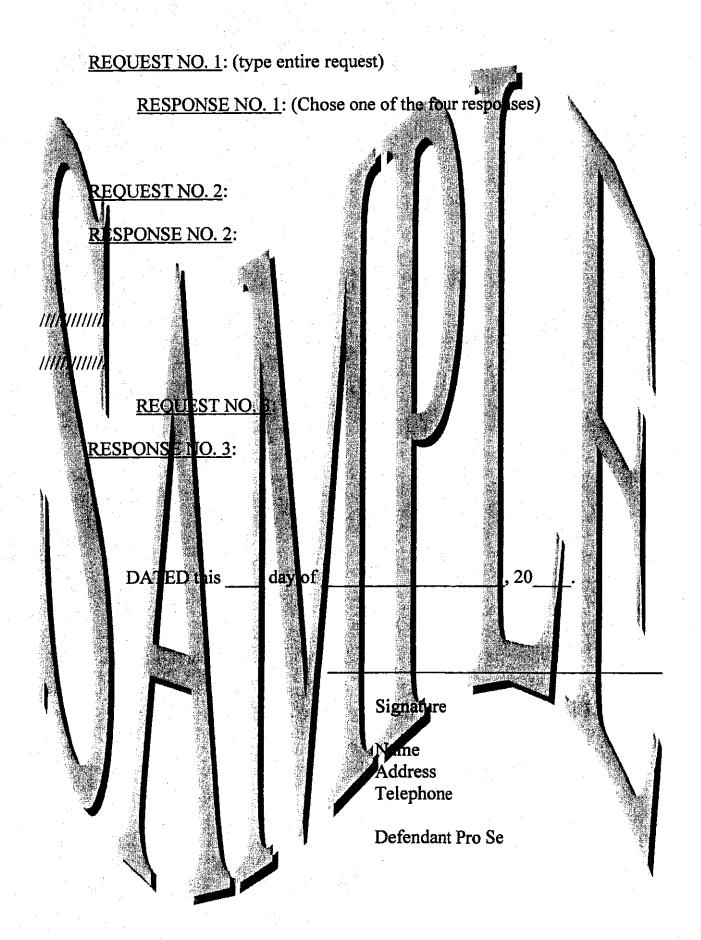
Defendant does not have the knowledge to admit or deny, and so denies the request.

(4) If you have grounds to object, write "objection" and state the grounds. See, for example, the rules of evidence, NRS Chapters 47 through 56.

You cannot give lack of information or knowledge as a reason for failure to admit or deny unless you state that you have made reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to either admit or deny.

Be sure to sign your Response and include proof of service.

Name		**************************************	
Address			
Telephone			
Defendant Pro Se			
	JUSTICE	Burr 1	
Plaintiff, vs.) Defendant. PLAIN	CLARK COUN CLARK COUN CLAR	Case No. Dept No. ESPONSE TO FOIL ADMISS , Plai	tiff; and
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Defendant's Response to Plaintiff's Request for Production of Documents

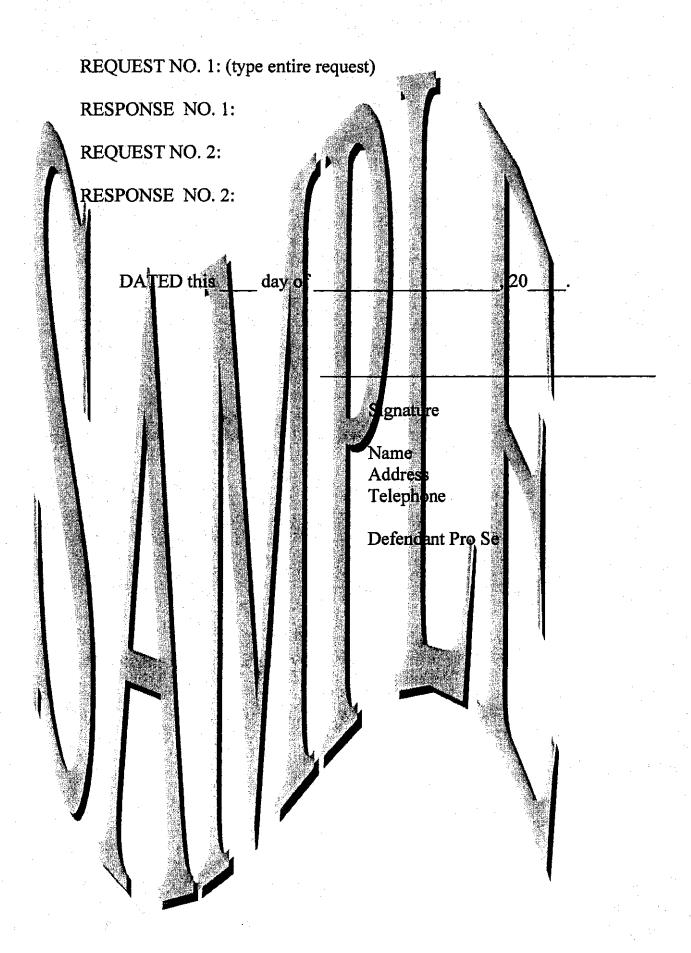
Attached is a format sample to assist you in p eparing your Response to laintiff's request for Product on of Documents.

Lemember you have only thirty (30) days from the day you were served to respond. Sanctions may be imposed if you do not response within thirty (30) days. You must send a copy of you Responses to the Plaintiff's attorney; remember to fill in the certificate of mailing prior to mailing. You do not need to file your Response with the Court Clerk. Keep the original for your records.

Each request must be stated and answered. If the request is for a document attach alphotocopy of it to your Response, identify and describe it, and state that such is attached. If you object to the request, you must state your objection and the reasons for your objection. For a list of other objections consult the jules of evidence, NRS Chapters 47 through: 6.

Be sure to sign your Response and include proof of service

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