

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 JCRC Rule 25A. Justice Court rules may be found at:

<http://www.leg.state.nv.us/CourtRules/JCRC.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**

Plaintiff,)
vs.) Case No.
Defendant.) Dept. No.
_____)
_____)

DEFENDANT'S ANSWERS TO INTERROGATORIES

To: _____, Plaintiff; and

To: _____, attorney for Plaintiff:

Defendant, _____, in response to the Interrogatories propounded by
the plaintiff on the _____ day of _____, 20____, states as follows:

INTERROGATORY NO. 1: (type entire interrogatory)

ANSWER TO NO. 1:

INTERROGATORY NO. 2:

ANSWER TO NO. 2:

INTERROGATORY NO. 3:

ANSWER TO NO. 3:

DATED this ____ day of _____, 20____.

Signature
Name
Address
Telephone
Defendant Pro Se

VERIFICATION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

_____, under penalties of perjury,
being first duly sworn, deposes and says:

That I am the Defendant in the above-entitled action; that I have read the foregoing Answers to Interrogatories and know the contents thereof; that the same is true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

DATED this _____ day of _____, 20__.

Signature

SUBSCRIBED and SWORN to
before me this _____ day of _____ 20__

by _____.

NOTARY PUBLIC

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the _____ day of _____,
20____ I placed a true and correct copy of the foregoing ANSWERS TO
INTERROGATORIES in the United States Mail in Las Vegas, Nevada, with first-
class postage prepaid, addressed to the following:

Defendant Pro Se

**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.

REQUEST NO. 1: (type entire request)

RESPONSE NO. 1: (Chose one of the four responses)

REQUEST NO. 2:

RESPONSE NO. 2:

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REQUEST NO. 3:

RESPONSE NO. 3:

DATED this _____ day of _____, 20____.

Signature

Name

Address

Telephone

Defendant Pro Se

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the _____ day of _____,
20____ I placed a true and correct copy of the foregoing RESPONSE TO
REQUEST FOR ADMISSIONS in the United States Mail in Las Vegas, Nevada,
with first-class postage prepaid, addressed to the following:

Defendant Pro Se

**Defendant's Response to
Plaintiff's Request for Production of Documents**

Attached is a format sample to assist you in preparing your Response to Plaintiff's request for Production of Documents.

Remember you have only 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 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 a photocopy 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 rules of evidence, NRS Chapters 47 through 46.

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

Name
Address
Telephone
Defendant Pro Se

**JUSTICE COURT
CLARK COUNTY, NEVADA**

Plaintiff,

)
) Case No.
)
)

) Dept. No.
)
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)
)

vs.

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)
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)
) Defendant.
)
)

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS**

To: _____, Plaintiff; and

To: _____, attorney for Plaintiff;

Defendant herein, _____, in response to the Requests
for Production of Documents submitted by the plaintiff on the _____ day of
_____ 20____, states as follows:

REQUEST NO. 1: (type entire request)

RESPONSE NO. 1:

REQUEST NO. 2:

RESPONSE NO. 2:

DATED this _____ day of _____, 20__.

Signature

Name
Address
Telephone

Defendant Pro Se

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the _____ day of _____,
20____ I placed a true and correct copy of the foregoing RESPONSE TO
REQUESTS FOR PRODUCTION OF DOCUMENTS in the United States Mail
in Las Vegas, Nevada, with first-class postage prepaid, addressed to the following:

Defendant Pro Se