

In Re: Lead Paint Litigation
Hon. Linda K. Lager

Defendant's Court Approved Non-Standard Interrogatories and Requests to Produce Directed to the Plaintiffs:

Pursuant to Connecticut Practice Book §§217–230 (now §§ 13-2–13-12), as revised, the defendant(s) hereby propound(s) the following interrogatories and requests for production, and request(s) that the plaintiffs answer these interrogatories in writing and under oath according to Connecticut's rules of practice and according to the definitions and instructions contained herein, and serve a copy of such answers to such interrogatories and legible photocopies of all documents responsive to such requests for production upon the undersigned counsel for the defendant(s), within sixty (60) days of service of these interrogatories and requests to produce.

These are court-approved non-standard interrogatories and requests for production. All objections have been ruled upon at a hearing conducted on January 31, 1997. By order of the court, there shall be no further objections to these interrogatories and requests, and they shall be answered.

INSTRUCTIONS AND DEFINITIONS:

A. At all times herein, the use of the plural shall also imply the singular and the use of the singular shall also imply the plural.

B. At all times herein, the use of the conjunctive shall imply the disjunctive and the use of the disjunctive shall imply the conjunctive.

C. The term "person" shall mean any individual, partnership, firm, corporation, association, joint venture, business, organization, entity, or any employee or agent thereof.

D. The term "document" or "documents" have the fullest meaning of that term within the scope of Connecticut Practice Book § 227 (now § 13-9), as revised, and shall mean the original or a copy of any written, printed, typed, photocopied, photographic and recorded material, however produced or reproduced, in your possession or control or known by you to exist, including, without limiting the generality of the foregoing, all drafts, contracts, diaries, calendars, desk pads, correspondence, communications, telegrams, teletypes, memoranda, notes, studies, reports, drawings, graphs, charts, viewgraphs, photographs, films, microfilm, slides, magnetic and electronic recordings, sound recordings, lists, minutes and entries in books of account relating or referring in any way to the subject matter of these Interrogatories.

E. The term "you" and "your" shall mean the named plaintiff(s) or that plaintiff's agents and duly authorized representatives and all other persons acting on behalf of the plaintiff(s).

F. The terms "premises" and "property" refer to the property located at _____, including the interior and exterior of the building and the common areas and yard of that location.

G. The terms "identify," "identification" and "describe" or "description":

(1) When used in reference to an individual, shall mean to state that individual's full name, present or last known residence, telephone number, business or official affiliation, job title, date of first employment by present employer and business address (by street, city, state and zip code);

(2) When used in reference to a corporation, shall mean to state its full name, its date of incorporation and its principal place of business;

(3) When used in reference to an entity other than an individual or corporation, shall mean to state its official name, its organization form and its address;

(4) When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, serial or file number, its present location, the name and address of its custodian and the substance of the contents thereof. If a document has been destroyed, state when and where destroyed, identify the person who destroyed it and the person or persons who directed the destruction. In lieu of identifying any document, copies thereof may be furnished;

(5) When used in reference to any act, occurrence, occasion, meeting, oral or written communications, discussion, transaction or conduct, shall mean to set forth the events constituting such act, its location, the date and persons participating, present or involved and the documents relating or referring in any way thereof;

(6) When used in reference to any discussion, conversation, oral communication or statement, shall mean, in addition to the foregoing, to set forth the substance of the discussion;

(7) When used in reference to any physical item, shall mean to set forth a description of the item, its location and its size or quantity.

H. These interrogatories are continuing and require supplemental answers if you obtain further information between the time your answers are served and the time of final judgment.

I. This discovery is not seeking information which is protected by the attorney-client privilege. Nor does it seek discovery of the mental impressions, conclusions, opinions or legal theories of an attorney or other representative of a party concerning the litigation. Unless otherwise specified, the requests do not seek the disclosure of materials, documents and tangible things prepared in anticipation of litigation or for trial by or for another party or by or for that other party's representative except upon a showing that the party seeking the discovery has substantial need of the materials in the preparation of his case and that he is unable without undue hardship to obtain the substantial equivalent of the materials by other means as required under the rules of practice. However, to the extent discovery does request disclosure of documents and tangible things prepared in anticipation of litigation or for trial, the answer provided, without revealing information itself privileged or protected, should enable other parties to assess the applicability of the privilege or protection.

DEFENDANT'S STANDARD LEAD PAINT INTERROGATORIES:

1. For each of the following individuals, state their names, other names by which they are known or have been known, date of birth, residence address, occupations, and Social Security number:

- a. yourself;
- b. your biological mother;
- c. your biological father; and
- d. your siblings (both living or deceased, including adopted, half and step siblings).

ANSWER:

2. Identify each person who has answered or contributed any information used in answering these interrogatories. If more than one person provided the information, state which person(s) provided information used in answering each interrogatory.

ANSWER:

3. Please state the language primarily spoken in the home by yourself, each of your siblings and other members of your household.

ANSWER:

4. For each residence in which the minor plaintiff has resided from the time s/he was conceived to the present:

- a. state the address of each residence including apartment number if applicable;
- b. state the dates of occupancy by the minor plaintiff for each residence;
- c. describe in detail any construction, renovation, repair or maintenance work

involving interior or exterior woodwork and/or paint, including the name of the person(s) and/or company(ies) that performed such work;

- d. identify the maintenance person(s), superintendent(s), and building manager(s) for each residence during the period the minor plaintiff resided there; and for each person, indicate whether he/she resided on the premises;
- e. identify all persons who have lived with the minor plaintiff at each residence for greater than 90 days, and state their relationship to the minor plaintiff and the dates each person resided with the minor plaintiff;
- f. identify the owner or lessor of the residence and state their relationship to the minor plaintiff;
- g. state whether you or any person identified in Interrogatory No. 1 received any form of rental or mortgage subsidy related to the residence; and
- h. for each instance when assistance has been provided, state the identity of the person, agency, organization or institution providing assistance.

ANSWER:

5. For each subsidized premises in which the minor plaintiff has resided from conception to the present, state whether the premises were inspected by any public agency or other organization in connection with the subsidy provided. If so, please indicate which premises were inspected, the date of inspection and whether you possess any documentation pertaining to this inspection.

ANSWER:

6. Specify each residence where you claim the minor plaintiff has ingested, inhaled, or was otherwise exposed to lead or lead-based paint.

ANSWER:

7. Identify the name of any business, person or governmental agency that has conducted a lead inspection in any of the residences where the minor plaintiff has lived, during his or her lifetime, other than experts who have been retained in anticipation of litigation who are not expected to be called as witnesses at trial.

ANSWER:

8. For each inspection identified in the preceding interrogatory please state:

- a. the dates of each such inspection; and
- b. the address of the property which was inspected.

ANSWER:

9. State whether you ever notified the owner(s), maintenance person(s), superintendent(s), or building manager(s) of the residence(s) identified in

Interrogatory No. 6 concerning the existence of peeling, flaking, chalking, or cracked paint, and whether such notice was oral or written.

ANSWER:

10. For each notice of defective paint at **every** residence identified in response to Interrogatory No. 9:

- a. identify the person(s) to whom notice was given;
- b. the date(s) of the notice(s);
- c. the circumstance(s) that led to each notice;
- d. the substance of each notice; and
- e. whether a response was given, by whom, and the manner and substance of such response.

ANSWER:

11. For each location identified in Interrogatory No. 6:

- a. state the dates you allege that the minor plaintiff ingested, inhaled or was otherwise exposed to lead;
- b. describe in detail the manner in which the minor plaintiff was exposed to lead;
- c. identify with specificity all sites on the premises (interior and/or exterior) for all the alleged lead exposure, and for each site:
 1. provide the name, address and telephone number of each person who has personal knowledge of the alleged lead exposure.

ANSWER:

12. For each residence where the minor plaintiff resided, state whether the residence was viewed by you or a family member, before it was rented, and if so:

- a. the date of each viewing; and
- b. the name, address and telephone number of each person present at the viewing.

ANSWER:

13. State whether lead abatement has been performed at any of the property where the minor plaintiff has resided. If so, please state:

- a. the address of the property where the abatement was performed;
- b. who performed the abatement;
- c. the date(s) the abatement work was done;

- d. the cost of the abatement;
- e. the identity of the individuals present when the abatement was done; and
- f. what, if any, safety precautions were taken when the abatement was done.

ANSWER:

14. Identify all of the minor plaintiff's relatives, babysitters, and daycare providers who have cared for him or her for a period of two consecutive weeks or more, at any other address, other than the minor plaintiff's place of residence from the date of his or her birth until the present time.

ANSWER:

15. For each person identified, state:

- a. the person's name and address where they cared for the minor plaintiff;
- b. the dates the daycare or baby-sitting service were provided;
- c. the duration of their care (hours per day, days per week, and entire period of time of care); and
- d. the minor plaintiff's relationship, if any, to each person.

ANSWER:

16. If the minor plaintiff spent time in a pre-school, school or camp on a regular basis from birth to the present time, state:

- a. the name and address of the institution or facility;
- b. the amount of time each day that the minor plaintiff spent there; and
- c. the dates of attendance.

ANSWER:

17. Please state whether you are aware of any facts indicating that the minor plaintiff's elevated lead level is from any of the following:

- a. water pipe and pipe fittings;
- b. soldering equipment or supplies;
- c. ambient air;
- d. groundwater;
- e. automobile batteries;
- f. residential housing construction materials other than paint;
- g. rust-inhibitive and automobile paints;
- h. wallpaper;
- i. brick, ceramics, tile, pottery and terra cotta;
- j. cosmetics and/or jewelry;
- k. printing ink and newsprint;
- l. cigarette ash;
- m. indoor and outdoor playground equipment;

- n. eating and drinking utensils including cookware and leaded pottery and leaded crystal;
- o. playground and school equipment;
- p. furniture, toys or cribs;
- q. ammunition;
- r. fishing weights;
- s. stained glass; and
- t. mini blinds.

ANSWER:

18. Has the minor plaintiff ever been observed eating non-food substances (e.g., dirt, crayons, etc.), or diagnosed to have pica (i.e., a tendency to eat non-food substances)? If so, state:

- a. the name and address of each person who made such observation or diagnosis;
- b. the date of each observation or diagnosis; and
- c. the substance for each observation and the factual basis for each such diagnosis.

ANSWER:

19. From the time of conception of the minor plaintiff to the present, has the minor plaintiff been exposed to lead or lead bearing compounds from any sources other than paint? If so, identify the type of exposure, the location of exposure and describe the product to which the minor plaintiff was exposed.

ANSWER:

20. If the minor plaintiff's mother received pre-natal, peri-natal or neo-natal care while pregnant with the minor plaintiff state:

- a. the name and address of each physician or other health care professional who provided such care;
- b. the name of every hospital, clinic or other institution at which such care was received;
- c. the type of care or treatment provided;
- d. the results of any examinations conducted; and
- e. all diagnoses made.

ANSWER:

21. Identify each physician, hospital, clinic or other health care provider who has examined or treated the minor plaintiff from birth to the present, including both physical or psychological care.

ANSWER:

22. State the name and address of the hospital at which the minor plaintiff was born and the name of the medical provider(s) attending upon birth.

ANSWER:

23. State whether the minor plaintiff was suffering from any disease, disability or defect prior to the alleged exposure to lead and if so, describe the nature and duration of same.

ANSWER:

24. Please indicate the name and address of the health care provider who first advised that the minor plaintiff have a lead test, and state the date of and reason for the appointment or consultation with said health care provider.

ANSWER:

25. For all physicians or health care providers, other than experts who have been retained in anticipation of litigation, who examined or treated the minor plaintiff in connection with any symptoms or complaints due to the ingestion, inhalation or other exposure to lead or lead-based paint, state:

- a. the name and address of each physician or health care professional who treated or examined or consulted with the minor plaintiff;
- b. the date of each treatment, examination or consultation;
- c. the nature of the symptoms or complaint for which treatment was sought;
- d. any diagnosis that was made including the date of the diagnosis;
- e. the specific course of treatment or therapy including any medication prescribed; and
- f. the duration of the symptoms or complaint and its present state.

ANSWER:

26. For all physicians or health care providers who have been retained in anticipation of litigation, who examined or treated the minor plaintiff in connection with any symptoms or complaints due to the ingestion, inhalation or other exposure to lead or lead-based paint, state:

- a. the name and address of the physician or health care provider; and
- c. the date(s) of each treatment, examination or consultation.

ANSWER:

27. For each occasion on which the minor plaintiff's blood was tested for the presence of lead, please state the following:

- a. the date and facility of each test;
- b. the health care provider who performed the test;
- c. the result of each test;

- d. whether you were provided with written test results;
- e. the method used to obtain the blood sample; and
- f. the method used to determine the level of lead in the blood.

ANSWER:

28. For every test of erythrocyte protoporphyrin level ("EP") that has ever been performed on the minor plaintiff state:

- a. the date and facility of each test;
- b. the method used to obtain the sample;
- c. the method used to determine the level of lead in the blood;
- d. the level of lead found; and
- e. the identity of all persons who conducted each test and state where the test was conducted.

ANSWER:

29. If the minor plaintiff's dentine lead level has ever been tested, state:

- a. the date and facility of each test;
- b. the method used to obtain the sample;
- c. the method used to determine the level of lead in the dentine;
- d. the level of lead found; and
- e. the identity of all persons who conducted each test.

ANSWER:

30. For each test or procedure identified below which was performed on the minor plaintiff to test for the presence of lead, please state the date(s) of such test or procedure, the name and address of the person or institution ordering and performing such test or procedure and the result of each such test or procedure:

- a. hemoglobin hematocrit reticulocyte smear;
- b. urinalysis;
- c. urine lead output;
- d. qualitative urinary coproporphyrinuria;
- e. MRI, CT scan or X rays; and
- f. scalp hair analysis.

ANSWER:

31. Other than blood lead tests, state the date of any examination, treatment, tests or care which the minor plaintiff received from any health care provider or institution since birth, for all injuries, illnesses or disabilities which are claimed as a result of the alleged occurrence, setting forth in detail the following as to each such date of examination, treatment, test or care:

- a. the date of such examination, treatment, test or care;
- b. the name of the doctor, hospital or other health care provider or institution;
- c. the nature of each such examination, treatment, tests or care;
- d. all diagnoses and prognoses made;
- e. the result of any tests; and
- f. the inclusive dates of confinement, at any place, including the minor plaintiff's home, for medical reasons.

ANSWER:

32. Other than information which has been obtained from retained experts, describe in detail every symptom, behavior, injury, illness and condition alleged to have been caused by the minor plaintiff's exposure to lead-based paint including:

- a. each date upon which each effect and each symptom occurred or was noted, including the place and circumstances of occurrence as well as the period of time over which said symptom or effect was exhibited;
- b. the progressive order in which each effect and each symptom occurred or was noted in terms of sequence and severity;
- c. the date on which you first became aware that lead paint was causing or had caused the effect or symptoms;
- d. whether avoidance of contact with the paint was recommended and by whom, including the date and manner of such action; and
- e. the cause of each symptom or effect, including whether you contend lead was a substantial factor of each condition.

ANSWER:

33. For each instance in which the minor plaintiff has undergone chelation therapy, please state:

- a. the dates and types of therapy;
- b. where and by whom the therapy was performed;
- c. the type of chelation therapy used; and
- d. the minor plaintiff's blood lead level before and after the therapy.

ANSWER:

34. Has any treating doctor or treating medical provider diagnosed the minor plaintiff as suffering from a permanent condition resulting from lead exposure? If yes, state:

- a. the name and address of the treating doctor or treating medical provider; and
- b. the date of the diagnosis.

ANSWER:

35. Has any doctor or medical provider ever informed the minor plaintiff or anyone to the minor plaintiff's knowledge that the minor plaintiff was not suffering from a permanent condition resulting from lead exposure? If so, state the name and address of the doctor or medical provider.

ANSWER:

36. State whether the minor plaintiff has used medication for the treatment of any injury, sickness, disease or condition described in your Complaint. If so, for each medication state:

- a. the identity by trademark and generic name;
- b. the condition for which said medication was used;
- c. whether the medication was prescribed or recommended by a physician;
- d. if medication was prescribed by a physician, state:
 1. the name and address of each such prescribing physician; and
 2. each date on which each prescription was written and filled.

ANSWER:

37. Other than information which has been obtained from retained experts, do you claim that the minor plaintiff is suffering from any permanent disability as a result of the injuries or conditions described in the Complaint? If so, for each disability:

- a. describe in detail the disability;
- b. describe the part of the body affected;
- c. identify any individual rendering an opinion as to the disability;
- d. describe in detail the individual's opinions as to the percentage of the disability caused by the ingestion of lead; and
- e. describe in detail all activities claimed to have been affected by the injuries.

ANSWER:

38. Other than information which has been obtained from retained experts, if you allege that the minor plaintiff suffers from any mental, emotional, psychological, or developmental deficiencies or impairment as a result of the occurrence:

- a. describe each deficiency or impairment;
- b. state the date when each such deficiency or impairment was observed or diagnosed; and
- c. identify by name and address every witness to each alleged deficiency or impairment.

ANSWER:

39. Please state the names and addresses of every neuropsychologist, psychologist, counselor, psychiatrist, master of social work or similar professional who has ever

examined, counseled or treated the minor plaintiff and the date of each treatment, counseling session or examination.

ANSWER:

40. Provide the minor plaintiff's complete educational history, including:

- a. the names and addresses of all schools attended;
- b. dates of attendance; and
- c. present educational status.

ANSWER:

41. State whether the minor plaintiff has attended remedial education or special education classes or developmental programs while in school. If so, state:

- a. the dates of attendance;
- b. the names and addresses of all schools at which the minor plaintiff attended such classes; and
- c. the nature of the programs offered in these classes.

ANSWER:

42. State the highest grade of school completed for each of your biological parents and all of your siblings (including adopted, half and step siblings).

ANSWER:

43. Other than tests which have been conducted by experts who have been retained in anticipation of litigation, for every test of intelligence, behavior, or cognitive development that has been conducted on the minor plaintiff including but not limited to visual/motor performance, auditory/memory performance, speech/language ability, intelligent quotient, standardized scholastic achievement, assessment or aptitude tests, please state:

- a. the name and address of the person conducting the test(s) and the date when it occurred;
- b. the type of test(s);
- c. the maximum and minimum possible scores on the test; and
- d. all scores/results of the test(s) including learning disabilities and percentile ranks.

ANSWER:

44. For every test of intelligence, behavior, or cognitive development that has been conducted on the minor plaintiff including but not limited to visual/motor performance, auditory/memory performance, speech/language ability, intelligence quotient, standardized scholastic achievement, assessment or aptitude tests, which

have been conducted by experts who have been retained in anticipation of litigation and who are not expected to be called as a witness at trial, state:

- a. the name and address of the person conducting the test(s); and
- b. the date when it occurred.

ANSWER:

45. State whether you have any photographs prepared by parties concerning the subject premises and identify the custodian of any such photographs.

ANSWER:

46. State whether your attorney or any other representatives have any photographs of the subject premises and if so, state:

- a. the name and address of the individual who took the photographs; and
- b. the date the photographs were taken.

ANSWER:

47. Other than expert witnesses who have been retained in anticipation of litigation, state whether you or your representatives or investigators have ever engaged any person to test, examine, or analyze the alleged lead-based paint which is the subject of this lawsuit, or received results from any person engaged by anyone else. If so, state:

- a. the name, address, occupation, and professional qualification of each person;
- b. what the person tested, examined or analyzed;
- c. the date and type of each test, examination or analysis;
- d. the address each test, examination or analysis was made;
- e. the identity of all individual(s) who were present for said examination(s); and
- f. the result(s) of said examination.

ANSWER:

48. Did the person identified in the preceding interrogatory submit a report of his/her findings? If so, state:

- a. the date this report was submitted;
- b. the name and address of the person, institution or agency to whom this report was submitted; and
- c. the name and address of each person who has present custody of this report.

ANSWER:

49. For each expert witness who has been retained in anticipation of litigation who is not expected to be called as a witness to testify at trial, who tested, examined or analyzed the lead-based paint which is the subject of this lawsuit, state:

- a. the name and address of the expert; and
- b. the date(s) on which the alleged lead-based paint was tested, examined or analyzed.

ANSWER:

50. Identify each person whom you expect to call as an expert witness at trial. For each expert state:

- a. the subject matter on which the expert is expected to testify;
- b. the substance of the facts and opinions to which the expert is expected to testify; and
- c. a summary of the grounds for each opinion.

ANSWER:

51. State whether the minor plaintiff or anyone on his/her behalf has ever made any claim for, or received any health or accident insurance benefits, social security benefits or state or federal benefits for any disability or medical condition resulting from the ingestion, inhalation, or exposure to lead or lead-based paint. If so, state the following:

- a. the date each claim was made;
- b. the name and address of the person making the claim;
- c. the identifying number for each claim;
- d. the agency, insurer, employer or other entity against whom the claim was made;
- e. the nature of the claim; and
- f. the result of such claim, including the amount realized by way of settlement, judgment or award upon the claim.

ANSWER:

52. List each and every item of damage or expense which is claimed to have been incurred as a result of the occurrence alleged in the Complaint, including the amount of each item and the name and address of each person or entity to whom each item has been paid or is payable.

ANSWER:

53. Describe in detail all out-of-pocket expenses claimed to have been suffered as a result of the minor plaintiff's alleged exposure to lead, including, but not limited to, hospital charges, and medical charges and expenditures for medicines, identifying the person to whom paid, the date of payment and the amount paid.

ANSWER:

54. Has the minor plaintiff or anyone on his/her behalf brought any claims for lead exposure against anyone else? If yes, state:

- a. The docket number and place of filing for any lawsuit;
- b. The name of the person or insurance carrier against whom the claim has been made.

ANSWER:

55. Please state whether the minor plaintiff or anyone on his/her behalf has ever made, prior or subsequent to the incidents alleged in the Complaint, a claim or instituted a legal proceeding for personal injuries similar or related to those identified in your Complaint. If so, for each such claim or legal proceeding:

- a. state the date and place of each such claim or legal proceeding, the names and addresses of the parties to the action or claim, and the names and addresses of their attorneys, if any;
- b. if an action was filed in a court of law, set forth the title and docket number of each such action;
- c. state the nature of each injury alleged to have been sustained;
- d. identify the attending medical personnel and any and all institutions or hospitals providing examination, treatment or care, including addresses and dates; and
- e. state the present status of each such claim or legal proceeding. If terminated, give the final date and disposition.

ANSWER:

56. Please state when and how you first became aware that there was lead-based paint on the subject premises as alleged in your Complaint, including but not limited to:

- a. the date(s) you first were made aware;
- b. how you were notified or made aware; and
- c. by whom you were notified or made aware.

ANSWER:

57. Describe in detail all efforts made by you or anyone on your behalf to determine the source of the lead-based paint which you alleged caused your injuries.

ANSWER:

58. After becoming aware of the existence of lead paint at the subject premises as alleged in your Complaint, please identify each individual or entity whom you notified, including:

- a. the dates of said notification;
- b. the identity of the individuals or entities you notified;
- c. whether such notification was oral or written; and
- d. if written, the location of any copy of said notification.

ANSWER:

59. Between what dates did you reside in the property located at _____?

ANSWER:

60. Describe in detail the nature and terms of the tenancy agreement with the defendants for the subject premises, including but not limited to:

- a. whether the tenancy agreement was oral or written;
- b. if written, the names and addresses of the individual who has a copy of the same;
- c. monthly rent;
- d. term;
- e. date of occupancy; and
- f. any warranties or representations, either written or oral made by the defendants as to the condition of the premises.

ANSWER:

61. State the duration and the nature of your exposure to lead.

ANSWER:

62. State whether you or any party gave any statement or statements as defined in Connecticut Practice Book § 216 (now § 13-1), to any person or persons other than your attorney regarding the occurrence or its subject matter alleged in your Complaint. If so, state:

- a. the name and address of the person who gave the statement;
- b. the date on which the statement was made;
- c. the name, address, occupation and job title or capacity of the person who obtained the statement;
- d. whether such statement or statements were written, made by recording device, or taken by court reporter or stenographer; and
- e. the name, address and occupation of all persons known to you to have copies of such statement.

ANSWER:

63. As to each individual with any knowledge of the facts underlying this action, state whether to your knowledge, or the knowledge of your attorney, such individual has given any statement or statements as defined in the Connecticut Practice Book § 216 (now § 13-1) concerning the subject matter of the Complaint in this lawsuit. If so, state also:

- a. the name and address of the person who gave the statement;
- b. the date on which such statement or statements were taken;
- c. the names and addresses of the person or persons who took or who were present when such statement or statements were taken;
- d. whether such statement or statements were written, made by recording device, or taken by court reporter or stenographer; and
- e. the names and addresses of each person having custody or copies of such statement or statements.

ANSWER:

64. Has the minor plaintiff ever been the subject of a proceeding pertaining to neglect, custody, abuse or termination of parental rights?

ANSWER:

65. If the minor plaintiff has undergone any psychological or psychiatric testing, counseling, examination or treatment for psychological or psychiatric injuries which the minor plaintiff is not claiming in the Complaint, then for each such instance, please state:

- a. the name and address of the treating psychiatrist, psychologist or counselor;
- b. the dates of such testing, counseling, examination or treatment; and
- c. briefly describe the testing, counseling, examination or treatment in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.

ANSWER:

DEFENDANT'S STANDARD REQUESTS FOR PRODUCTION:

1. Other than documents which have been generated by experts who have been retained in anticipation of litigation, for each residence in which the minor plaintiff has ever lived, all documents reflecting any:

- a. inspection of the premises by any public or private agency or organization, or its agent/representative/ employee;
- b. testing for the presence of lead or lead-based paint; and
- c. abatement or removal of lead-based paint.

ANSWER:

2. All documents reflecting each and every test of the blood lead level, the level of erythrocyte protoporphyrin, dentine level or any other test for lead that has ever been performed on the minor plaintiff.

ANSWER:

3. Produce copies of or execute authorizations to obtain all documents reflecting any diagnosis or observation that the minor plaintiff has pica.

ANSWER:

4. Produce copies of or execute authorizations to obtain all documents reflecting any chelation therapy performed on the minor plaintiff.

ANSWER:

5. Produce copies of or execute authorizations to obtain all documents reflecting any drugs or other medication which have been prescribed to the minor plaintiff in connection with any injury or condition described in your Complaint.

ANSWER:

6. Produce copies of or execute authorizations to obtain all medical records, hospital records, reports of all doctors and health care providers, or reports or other documents reflecting the examination, testing, diagnosis or treatment of the minor plaintiff, for any medical examinations, treatment for injuries, illnesses, accidents or operations from his or her conception to the present other than records or reports which have been generated by experts who have been retained in anticipation of litigation.

ANSWER:

7. Produce copies of or execute authorizations to obtain all X rays, documents referencing the examination of any X rays, and documents referencing the examination by X ray florescence of the minor plaintiff relative to the minor plaintiff's exposure or non-exposure to lead.

ANSWER:

8. Produce copies of or execute authorizations to obtain all tests administered to or taken by the minor plaintiff from birth to the present involving intellectual, educational, behavioral, psychological, neuropsychological, fine and gross motor developmental skills, intelligence, behavior or cognitive development, including but not limited to the results, evaluations, conclusions, opinions, reports, and

recommendations made as a result of any such tests other than tests which have been conducted by experts who have been retained in anticipation of litigation.

ANSWER:

9. Produce copies of or execute authorizations to obtain all documents reflecting any psychological or psychiatric testing, counseling, examination or treatment received by the minor plaintiff for any mental condition of the minor plaintiff claimed in the Complaint to be in issue in this case other than tests which have been conducted by experts retained in anticipation of litigation.

ANSWER:

10. Produce copies of or execute authorizations to obtain all records of the minor plaintiff from any school, special education program, nursery, or preschool or daycare facility, or child care facility, including but not limited to report cards, reports, test results, standardized test results, achievement scores, evaluations, and teacher progress notes.

ANSWER:

11. All documents reflecting any claim referred to in response to Interrogatory No. 51 made by the minor plaintiff or on his or her behalf for health or accident insurance benefits, social security benefits or state or federal benefits for any disability or medical condition.

ANSWER:

12. All Complaints reflecting any claim or lawsuit by the minor plaintiff or made on his or her behalf for any personal injuries similar or related to those identified in your Complaint.

ANSWER:

13. Produce copies of or execute authorizations to obtain all documents reflecting any out-of-pocket expenses the minor plaintiff or anyone on his or her behalf claim to have suffered as a result of the minor plaintiff's alleged lead exposure, including but not limited to, documents reflecting hospital charges, medical charges and expenditures for medicines.

ANSWER:

14. Produce copies of or execute authorizations to obtain all documents including but not limited to medical bills which refer or relate to any expenses incurred by you as a result of the alleged lead exposure or the treatment thereof.

ANSWER:

15. All documents which you contend constitute actual notice to the defendant of the presence of lead to which you contend the minor plaintiff was exposed, including, but not limited to all documents which constitute, contain or refer to any notice given to the owners and/or maintenance person, superintendent, building manager or property owner of the property, of the existence of lead on the premises.

ANSWER:

16. All documents which constitute, contain, refer or relate to any notice of the presence of lead-based paint given to any maintenance person, superintendent, building manager or property owner of any other premises identified where the minor plaintiff resided.

ANSWER:

17. All correspondence created by the plaintiff which refer or relate in any way to the alleged lead exposure.

ANSWER:

18. Photographs of the interior and exterior of the subject property taken by parties during the minor plaintiff's tenancy.

ANSWER:

19. Other than documents which have been created by experts who have been retained in anticipation of litigation, produce copies of or execute authorizations to obtain all records, reports, notes, and test results of any lead poisoning prevention program concerning, relating, or pertaining to the minor plaintiff.

ANSWER:

20. All rent receipts, canceled checks, leases, correspondence, or other documents which evidence, refer or relate to the terms and conditions of your tenancy at the subject premises.

ANSWER:

21. All documents referring to or relating to your purchase of the premises.

ANSWER:

22. Copies of any non-privileged statements, as defined in Connecticut Practice Book §216 (now § 13-1), identified in response to Interrogatories Nos. 62 and 63, of any party and/or witness to this action or concerning its subject matter, including

all written statements or transcriptions of written statements in your possession or under your control.

ANSWER:

23. Produce copies of or execute a written authorization allowing the defendant to examine any public housing authority records from the date of the minor plaintiff's birth through the present, for dwellings where the minor plaintiff resided which were subsidized.

ANSWER:

24. All reports produced by any expert(s) who the plaintiff anticipates will testify at the trial of this case.

ANSWER:

25. All Curriculum Vitae of any expert(s) whom the plaintiff anticipates will testify at the trial of this case.

ANSWER:

26. Copies of all independent lead inspections referred to in the preceding interrogatories, including, but not limited to, inspections performed by experts whom the defendants expect will testify at trial, and excluding only inspections performed by undisclosed or undeclared experts specially retained or employed in contemplation or anticipation of litigation.

ANSWER: