

1 Overly Broad and Unduly Burdensome; Redundant. Subject to and without any waiver
2 of the General Objections, see the Answer to Interrogatory No. 11 above.

3 24. List the names and addresses of all hospitals where you have been admitted either
4 as an inpatient or an outpatient during the last five (5) years prior to the incident herein sued
5 upon, and, as to each such hospital, state:

- 6 (a) The name of the hospital and the dates of admission and discharge from same;
- 7 (b) The nature of the ailment or illness for which you were hospitalized; and
- 8 (c) The name and address of each of your attending physicians and/or surgeons.

9 **ANSWER:**

10 Overly Broad and Unduly Burdensome. Subject to and without any waiver of the
11 General Objections, the Plaintiff has been admitted to Oakwood Hospital and Garden City
12 Hospital within the past (5) years.

13 25. Have you ever before made a claim or filed a lawsuit against anyone growing out
14 of any personal injury to yourself or any member of your family? If so, state:

- 15 (a) The names of the parties involved;
- 16 (b) The date of filing the Complaint;
- 17 (c) The suit case number; and
- 18 (d) The county in which said suit was instituted.
- 19 (e) List any such claims or lawsuits and the dates and places where filed.

20 **ANSWER:**

21 Equal Access. Subject to and without any waiver of the General Objections, the
22 Defendants are free to conduct a public records search.

23 26. Is the Plaintiff a beneficiary of any Medicare Payment?

24 **ANSWER:**

25 Yes.

26 27. Please sign the attached authorizations for medical and employment records and
27 attach to your Answers to these Interrogatories.

28 **ANSWER:**

29
30 _____
ZIHRA SAAD


Nemer N. Hadous
Attorney for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16

Subscribed and sworn to before me
this ____ day of _____ 2011.

, Notary Public

_____ County, Michigan

Acting in _____ County

My Commission Expires: _____

1 hospitals in California and Nevada.

2 (b) Do not recall.

3 (c) Do not recall.

4
5 25. Have you ever before made a claim or filed a lawsuit against anyone growing out
6 of any personal injury to yourself or any member of your family? If so, state:

7 (a) The names of the parties involved;

8 (b) The date of filing the Complaint;

9 (c) The suit case number; and

10 (d) The county in which said suit was instituted.

11 (e) List any such claims or lawsuits and the dates and places where filed.

12 **ANSWER:**

13 Equal Access. Subject to and without any waiver of the General Objections, the
14 Defendants are free to conduct a public records search.

15
16 26. Is the Plaintiff a beneficiary of any Medicare Payment?

17 **ANSWER:**


18 No.

19
20 27. Please sign the attached authorizations for medical and employment records and
21 attach to your Answers to these Interrogatories.

22 **ANSWER:**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19

JOSEPH SAAD



Nemer N. Hadous
Attorney for Plaintiffs

Subscribed and sworn to before me
this ____ day of _____ 2011.

, Notary Public
____ County, Michigan
Acting in _____ County

My Commission Expires: _____