

33.1 Interrogatories.

- (a) Sequential Numbering.** A party must number each interrogatory sequentially, despite the number of interrogatory sets.
- (b) Separate Definitions Prohibited.** A party may not separately define words used in an interrogatory without the court's leave.
- (c) Number of Interrogatories.** In determining the number of interrogatories, including subquestions, each inquiry seeking a discrete item of information is counted as one interrogatory. For example, the following question is counted as 3 interrogatories: "Please state the name, address, and telephone number of any witness to the accident set forth in the complaint."
- (d) Form of Response.** In answering or objecting to interrogatories, the responding party must first state verbatim the interrogatory and immediately thereafter the responsive answer or objection.
- (e) Certificate of Service.** The demanding party, when serving interrogatories, must file a certificate of service. The responding party must also file a certificate of service upon serving a response.
- (f) Alternative Methods of Service.** If all parties agree, interrogatories and answers or objections may be served by e-mail or fax. The answering party must maintain during the pendency of the proceeding a paper copy of all answers to interrogatories, sworn to and signed as required by Federal Rule of Civil Procedure 33(b), and must produce this copy upon a party's request.