

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.