

Subject: RE: suggest rules changes

From: Noble, Cesar
Sent: Tuesday, June 15, 2021 3:05 PM
To: McDonald, Andrew
Subject: suggest rules changes

Andrew:

I hope all is well with you and that you have survived this pandemic as well as possible. I am sitting on a jury trial (Joy and Rapture!) involving a premises liability claim. It struck me that our standard jury interrogatories Form 203 and Form 206 of the requests for production should include an inquiry into whether there was an agreement for snow and ice removal and the existence of a contract for same. I have taken the liberty of drafting some suggested language as attached. I thank you and the committee for considering these additions and hope you have a great summer

Hon. Cesar A. Noble
Judge, Superior Court

Premises Liability Standard form discovery

Interrogatories

X. State whether a contract existed for snow and ice remediation for the location on which the plaintiff claims to have been injured.

Y. State whether you received or prepared any invoices or records related to snow and/or ice remediation for the location on which the plaintiff claims to have been injured for the 30 days prior to the date on which the plaintiff claims to have been injured.

Request for Production

£. A copy of any contract identified in response to Interrogatory #X.

€. A copy of any documents identified in response to Interrogatory # Y.